

10 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
11 CONFIDENTIALITY REVIEW

15 Videotaped Deposition of DEBBIE HODGES, held  
16 at 4206 South J.B. Hunt Drive, Rogers,  
17 Arkansas, commencing at 8:15 a.m., on the  
18 above date, before Debra A. Dibble, Certified  
Court Reporter, Registered Diplomate  
Reporter, Certified Realtime Captioner,  
Certified Realtime Reporter and Notary  
Public.

23 GOLKOW LITIGATION SERVICES  
877.370.3377 | fax 917.591.5672  
deps@golkow.com

Page 2			Page 4		
1 A P P E A R A N C E S:			1		
2 CARELLA, BYRNE, CECCHI, OLSTEIN,			1 I N D E X		
3 BRODY & AGNELLO			2		
4 BY: MICHAEL A. INNES, ESQUIRE			3 DEBBIE HODGES PAGE		
5 minnes@carellabyrne.com			4 DIRECT EXAMINATION BY MR. INNES 7		
6 ZACHARY S. BOWER, ESQUIRE			5 E X H I B I T S		
7 zbower@carellabyrne.com			6 No. Description Page		
8 5 Becker Farm Road			7 Walmart 10-13-17 email from Nick 286		
9 Roseland, New Jersey 07068-1739			8 Hodges 1 Tallman to Debbie Hodges.		
10 (973) 994-1700			9 Subj: H&W Weekly Update		
11 Counsel for Plaintiffs			10 Week 37.		
12 JONES DAY			11 WMT_MDL_000002636-2638.		
13 BY: TINA M. TABACCHI, ESQUIRE			12 Walmart June 2017 email chain. 311		
14 tmtabacchi@jonesday.com			13 Hodges 2 Subj: RE: Thursday, July 6.		
15 PATRICK J. BEISELL, ESQUIRE			14 WMT_MDL_000006197.		
16 pbeisel@jonesday.com			15 Walmart October 2017 email chain. 326		
17 77 West Wacker			16 Hodges 3 Subj: Re: Buzzed.		
18 Chicago, Illinois 60601-1692			17 WMT_MDL_000008328.		
19 312-782-1692			18		
20 Counsel for Walmart			CERTIFICATE 356		
21 MARCUS & SHAPIRA, LLP			19		
22 (appearing telephonically)			20 ERRATA 358		
23 BY: DARLENE NOWAK, ESQUIRE			21 ACKNOWLEDGMENT OF DEPONENT 359		
24 dnowak@marcus-shapira.com			22		
25 301 Grant Street			23 LAWYER'S NOTES 360		
26 35th Floor			24		
27 Pittsburgh, Pennsylvania 15219-6401			25		
28 (412) 358-4690			Page 3		
29 Counsel for HBC			Page 5		
30 WRIGHT, LINDSEY & JENNINGS, LLP			1 PROCEEDINGS		
31 BY: CALEY B. VO, ESQUIRE			2 (January 11, 2019 at 8:05 a.m.)		
32 cvo@wlj.com			3 THE VIDEOGRAPHER: We are now		
33 3333 Pinnacle Hills Parkway			4 on the record. My name is		
34 Suite 510			5 Chris Ritona. I'm the videographer		
35 Rogers, Arkansas 72758-8498			6 for Golkow Litigation Services.		
36 (479) 986-0888			7 Today's date is January 11, 2019. And		
37 Counsel for McKesson			8 the time is approximately 8:06 a.m.		
38			9 This video deposition is being held in		
39 BARBER LAW FIRM, LLP			10 Rogers, Arkansas at Mitchell Williams,		
40 (appearing telephonically)			11 4206 South J.B. Hunt Drive, Suite 200,		
41 BY: J. CARTER FAIRLEY			12 in the matter of National Prescription		
42 cfairley@barberlawfirm.com			13 Opioid Litigation, MDL No. 2804, Case		
43 425 West Capitol Avenue			14 No. 17-MD-2804. United States		
44 Suite 3400			15 District Court, Northern District of		
45 Little Rock, Arkansas 72201			16 Ohio, Eastern Division. The deponent		
46 (501) 707-6182			17 today is Debbie Hodges.		
47 Counsel for Cardinal Health, Inc.			18 Will all counsel please		
48 REED SMITH, LLP			19 identify themselves for the record.		
49 BY: RYAN K. BLAKE, ESQUIRE			20 MR. INNES: Good morning. My		
50 rblake@reedsmith.com			21 name is Michael Innes with the law		
51 Three Logan Square, 1717			22 firm of Carella Byrne on behalf of		
52 Arch Street, Suite 3100			23 plaintiffs in the MDL.		
53 Philadelphia, PA, 19103			24 MR. BOWER: Good morning.		
54 (215) 851-8100			25 Zach Bower, also Carella Byrne, on		
55 Counsel for AmerisourceBergen					
56 ALSO PRESENT:					
57 Jennifer B. Bechet					
58 Senior Associate Counsel					
59 Walmart, Inc.					
60 THE VIDEOGRAPHER:					
61 Chris Ritona					
62 GOLKOW LITIGATION SERVICES					

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<p>1      behalf of plaintiffs in the MDL.</p> <p>2      MR. VO: Caley Vo, Wright</p> <p>3      Lindsey &amp; Jennings on behalf of</p> <p>4      McKesson.</p> <p>5      MR. FAIRLEY: Carter Fairley</p> <p>6      from the Barber Law Firm on behalf of</p> <p>7      Cardinal Health.</p> <p>8      MS. BECHET: Jennifer Bechet,</p> <p>9      senior associate counsel at Walmart,</p> <p>10     Incorporated.</p> <p>11     MR. BEISELL: Patrick Beisell,</p> <p>12     associate at Jones Day on behalf of</p> <p>13     Walmart.</p> <p>14     MS. TABACCHI: Good morning.</p> <p>15     Tina Tabacchi, Jones Day, on behalf of</p> <p>16     defendant Walmart and the witness.</p> <p>17     THE VIDEOGRAPHER: Will all</p> <p>18     counsel on the conference call please</p> <p>19     identify themselves.</p> <p>20     MR. SMITH: This is Wrede Smith</p> <p>21     from Arnold &amp; Porter representing Endo</p> <p>22     and Par.</p> <p>23     MS. NOWAK: This is Darlene</p> <p>24     Nowak, Marcus &amp; Shapira, for</p> <p>25     HBC Services.</p>	<p>1      Q. You understand that even though</p> <p>2      you're in a law office today, that the</p> <p>3      testimony you give under oath here is subject</p> <p>4      to the same penalty of perjury as if you were</p> <p>5      testifying in a court of law?</p> <p>6      A. Yes.</p> <p>7      Q. I'm going to assume you</p> <p>8      understand the questions that I ask you</p> <p>9      unless you tell me that I don't understand</p> <p>10     them that. Fair?</p> <p>11     A. Yes. If I don't understand</p> <p>12     them, I'll ask.</p> <p>13     Q. Thank you. Is there anything</p> <p>14     that would prevent you from thinking clearly</p> <p>15     today?</p> <p>16     A. No.</p> <p>17     Q. Is there anything that would</p> <p>18     prevent you from testifying truthfully today?</p> <p>19     A. No.</p> <p>20     Q. What, if anything, did you do</p> <p>21     to prepare for this deposition today?</p> <p>22     A. So counsel -- counsel and I had</p> <p>23     a session the day before yesterday, a brief</p> <p>24     session, and then we prepared yesterday as</p> <p>25     well. And then sometime -- sometime before</p>
Page 7	Page 9
<p>1      MR. BLAKE: This is Ryan Blake</p> <p>2      with Reed Smith on behalf of</p> <p>3      AmerisourceBergen.</p> <p>4      THE VIDEOGRAPHER: And the</p> <p>5      court reporter today is Debbie Dibble,</p> <p>6      and she will now please swear in the</p> <p>7      witness.</p> <p>8      DEBBIE HODGES,</p> <p>9      having first been duly sworn, was examined</p> <p>10     and testified as follows:</p> <p>11     DIRECT EXAMINATION</p> <p>12     BY MR. INNES:</p> <p>13     Q. Good morning, Ms. Hodges. I</p> <p>14     just introduced myself. My name is</p> <p>15     Michael Innes. I'm with the law firm of</p> <p>16     Carella Byrne in Roseland, New Jersey. I</p> <p>17     represent the plaintiffs in this case.</p> <p>18     You understand you're under</p> <p>19     oath, correct?</p> <p>20     A. Correct.</p> <p>21     Q. You may have to speak up so the</p> <p>22     folks on the phone can hear you.</p> <p>23     Have you ever testified under</p> <p>24     oath before?</p> <p>25     A. Yes.</p>	<p>1      the first of the year, we briefly met and</p> <p>2      prepared.</p> <p>3      Q. Okay. Let's take that in</p> <p>4      reverse order. The time before the first of</p> <p>5      the year. Was that an in-person meeting or</p> <p>6      by telephone?</p> <p>7      A. There was an in-person meeting.</p> <p>8      Q. And was that at your offices?</p> <p>9      A. It was here in Bentonville.</p> <p>10     Q. And was that at a law office in</p> <p>11     Bentonville?</p> <p>12     A. It was here in Bentonville. I</p> <p>13     don't recall where it was, the location.</p> <p>14     Q. You don't recall the address of</p> <p>15     that meeting?</p> <p>16     A. No. I don't recall the</p> <p>17     location.</p> <p>18     Q. Okay. Was it in a conference</p> <p>19     room?</p> <p>20     A. I don't recall the location.</p> <p>21     Q. Do you remember who attended a</p> <p>22     meeting?</p> <p>23     A. Sure. It was Tina, myself,</p> <p>24     Patrick.</p> <p>25     Q. What's Patrick's last name?</p>

	Page 10	Page 12
1	A. I don't know.	1 dropped in for a bit.
2	Q. Is it the Patrick that's	2 Q. And do you know Jennifer's last
3	sitting at counsel table?	3 name?
4	A. It is. It is.	4 A. I don't.
5	Q. Thank you.	5 Q. Is Jennifer here today?
6	Anyone else other than	6 A. Correct, she is.
7	yourself, Tina, or Patrick attend that	7 Q. And Jennifer is seated at the
8	meeting?	8 end of the table?
9	A. There were a couple of Walmart	9 A. She is.
10	attorneys that came in and out, but ...	10 Q. And you said there was one
11	And I couldn't tell you who	11 other Walmart attorney that attended?
12	their names were.	12 A. Mm-hmm. And I believe it was
13	Q. How are you certain that they	13 Rob. But I don't know Rob's last name.
14	were Walmart attorneys if you did not know	14 Q. I'll just take you to the third
15	their names?	15 and final session.
16	A. They identified themselves, and	16 Well, strike that.
17	they gave their names. I just can't -- I	17 How long was the second
18	don't recall their names.	18 session?
19	MS. TABACCHI: I can represent	19 A. It was four hours,
20	to you, Michael, that there's been	20 approximately.
21	nobody other than counsel in any of	21 Q. And where did that occur?
22	these meetings.	22 A. It occurred in the -- a
23	MR. INNES: Thank you, Tina.	23 conference room.
24	Q. (BY MR. INNES) Approximately	24 Q. At Walmart?
25	how long was that first session?	25 A. Correct.
	Page 11	Page 13
1	A. It was a few hours.	1 Q. And what's -- which -- what's
2	Q. During that session did you	2 Walmart's address?
3	review any documents?	3 A. It's on Walton Boulevard.
4	A. No, I don't believe I did.	4 Q. The location on Walton
5	Q. Did you review any deposition	5 Boulevard?
6	testimony in this case?	6 A. Correct.
7	A. No.	7 Q. And the final session, the one
8	Q. Did you review any court	8 the day before yesterday?
9	documents?	9 A. Same location.
10	A. I don't -- no.	10 Q. And what was the date of that
11	Q. Do you not recall or do you	11 session?
12	just not know?	12 MS. TABACCHI: I'm sorry, just
13	A. No, I said no.	13 to clarify, the final session was
14	MS. TABACCHI: I think that was	14 yesterday, not the day before
15	no. N-O.	15 yesterday.
16	THE WITNESS: Right, it was.	16 MR. INNES: I'm sorry.
17	It was no.	17 Q. (BY MR. INNES) What was the
18	Q. (BY MR. INNES) When was the	18 date of the final session?
19	date of the second session that you met with	19 A. It was yesterday.
20	counsel?	20 Q. Yesterday?
21	A. It was Wednesday of this week.	21 A. Yes.
22	Q. Okay. And who attended that	22 Q. And for how many hours did you
23	session?	23 meet?
24	A. Tina, Patrick, Jennifer, and	24 A. Approximately six to seven.
25	there was another Walmart attorney that	25 Q. And who was present at that

<p>1 meeting?</p> <p>2 A. Tina, Patrick, Jennifer.</p> <p>3 Q. The same Jennifer that's seated</p> <p>4 at the end of the table?</p> <p>5 A. Yes.</p> <p>6 Q. Anyone else?</p> <p>7 A. No.</p> <p>8 Q. In the second session, did you</p> <p>9 review any documents?</p> <p>10 A. Yes.</p> <p>11 Q. Did you review any deposition</p> <p>12 testimony?</p> <p>13 A. No.</p> <p>14 Q. Did you review any court</p> <p>15 documents?</p> <p>16 A. No.</p> <p>17 Q. In the third session, did you</p> <p>18 review any documents?</p> <p>19 A. Yes.</p> <p>20 Q. Did you review any testimony?</p> <p>21 A. Did I what?</p> <p>22 Q. Did you review any deposition</p> <p>23 testimony?</p> <p>24 A. No.</p> <p>25 Q. Did you review any court</p>	Page 14	<p>1 complaint in this case?</p> <p>2 A. I don't have any knowledge,</p> <p>3 other than communication with counsel.</p> <p>4 Q. Do you agree that the</p> <p>5 United States is currently in an opioid</p> <p>6 crisis?</p> <p>7 A. Yes.</p> <p>8 Q. What's the basis for your</p> <p>9 agreement with that statement?</p> <p>10 A. I'm aware of the -- what media</p> <p>11 publishes.</p> <p>12 Q. And what media sources</p> <p>13 specifically?</p> <p>14 A. I read newspapers.</p> <p>15 Q. Which newspapers do you read?</p> <p>16 A. I read the Benton County</p> <p>17 Gazette, or the Gazette. Democrat-Gazette, I</p> <p>18 think it's called. Occasionally I read the</p> <p>19 Wall Street Journal. I read an investment</p> <p>20 newspaper.</p> <p>21 Q. What investment newspaper is</p> <p>22 that?</p> <p>23 A. I think it's called IBD.</p> <p>24 Q. Are you aware that between 2000</p> <p>25 and -- year 2000 and year 2014, unintentional</p>
<p>1 documents?</p> <p>2 A. No.</p> <p>3 Q. Have you read the complaint</p> <p>4 that was filed in this case?</p> <p>5 A. No.</p> <p>6 Q. Are you familiar with the</p> <p>7 allegations in the complaint as they relate</p> <p>8 to Walmart?</p> <p>9 MS. TABACCHI: Object to the</p> <p>10 form. I'm also going to caution the</p> <p>11 witness not to reveal the substance of</p> <p>12 any communications with counsel.</p> <p>13 If you can answer the question</p> <p>14 without revealing the substance of</p> <p>15 communications with counsel, you may.</p> <p>16 Otherwise, I will instruct you not to</p> <p>17 answer the question if your</p> <p>18 understanding comes from</p> <p>19 communications with counsel, to the</p> <p>20 extent you had one.</p> <p>21 THE WITNESS: Can you repeat</p> <p>22 the question?</p> <p>23 Q. (BY MR. INNES) Other than your</p> <p>24 conversations with counsel, what is your</p> <p>25 knowledge, if any, of the allegations in the</p>	Page 15	<p>1 drug overdose deaths in the U.S. increased by</p> <p>2 137 percent?</p> <p>3 A. No.</p> <p>4 Q. Can you hear me?</p> <p>5 MS. TABACCHI: I'm having a</p> <p>6 little trouble hearing you.</p> <p>7 MR. INNES: I'll try to speak</p> <p>8 up.</p> <p>9 THE WITNESS: When he bends his</p> <p>10 head down. So just -- I have a</p> <p>11 hearing disability, and so I can watch</p> <p>12 your lips, and I'll be able to pick up</p> <p>13 on it. I have hearing aids. But when</p> <p>14 you bend your head down, it's very</p> <p>15 difficult for me to see your lips.</p> <p>16 MR. INNES: Sure. Thank you</p> <p>17 very much for pointing that out. And</p> <p>18 I'll do my best to speak with my face</p> <p>19 up so you can see my lips moving.</p> <p>20 Q. (BY MR. INNES) So maybe if I</p> <p>21 can, just do a little rearranging here.</p> <p>22 So I'll reread the --</p> <p>23 A. Sure.</p> <p>24 Q. -- re-ask the question.</p> <p>25 Between the year 2000 and 2014,</p>

<p style="text-align: right;">Page 18</p> <p>1 are you aware that unintentional drug 2 overdose deaths in the U.S. increased 3 137 percent? 4 A. I was not aware of that. 5 Q. Between -- were you aware that 6 between the year 2000 and 2014, there were 7 500,000 deaths due to prescription overdoses? 8 A. No, I was not aware of that. 9 Q. Were you aware that in 2015, 10 over 47,000 drug-related -- there were over 11 47,000 drug-related deaths? 12 A. No. I was not aware. 13 Q. Do you recall attending a DEA 14 Distributor Conference in Indianapolis, 15 Indiana on May 10th or 11th of 2016? 16 A. No. I did not attend that 17 conference.</p> <p style="text-align: right;">[REDACTED]</p> <p>22 Q. In preparation for today's 23 testimony, have you looked in your own 24 personal paper files for documents that might 25 be relevant to your testimony today?</p>	<p style="text-align: right;">Page 20</p> <p>1 My question is slightly 2 different. 3 I'm wondering if you attempted 4 to find such documents. 5 A. No. 6 Q. Did you -- prior to today, in 7 preparation for your testimony, did you speak 8 with any colleagues about your testimony? 9 A. No. 10 Q. Have you spoken with any family 11 members about the testimony you were about to 12 give? 13 A. No. 14 Q. Have you spoken with any 15 non-Walmart employees regarding the testimony 16 that you are about to give today? 17 A. No. 18 Q. Ms. Hodges, where did you 19 attend college? 20 A. Southwest Missouri State 21 University. 22 Q. And when did you graduate from 23 Southwest Missouri University? 24 MS. TABACCHI: Object to the 25 form.</p>
<p style="text-align: right;">Page 19</p> <p>1 A. I don't have any paper files. 2 Q. Have you looked in any 3 electronic files prior to today to help 4 prepare for your testimony? 5 MS. TABACCHI: Object to the 6 form. 7 THE WITNESS: I have looked at 8 documents that we reviewed over the 9 past couple of days. 10 Q. (BY MR. INNES) The documents 11 that you reviewed in preparation for today, 12 the only documents you reviewed, were those 13 with counsel? 14 A. Correct. 15 Q. You did not review any 16 documents outside of the presence of counsel? 17 A. Correct. 18 Q. Did you endeavor to look in 19 your own electronic or paper files for 20 documents that may help refresh your 21 recollections of any events that might be 22 relevant for today? 23 A. I did not look at any documents 24 in my files, either paper or electronic. 25 Q. Thank you.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. (BY MR. INNES) Strike that. 2 When did you graduate from Southwest Missouri 3 State University? 4 A. 1985. 5 Q. Okay. Did you attend any 6 graduate programs after your graduation from 7 college? 8 A. I did. 9 Q. And what school was that? 10 A. University of Missouri 11 Columbia. 12 Q. And what degree did you obtain 13 from University of Missouri Columbia? 14 A. A JD. 15 Q. And what year was that? 16 A. 1988. 17 Q. You graduated in 1988? 18 A. Correct. 19 Q. Did you sit for a bar exam 20 after your graduation? 21 A. I did. 22 Q. In what state did you sit for 23 the bar exam? 24 A. Missouri. 25 Q. And what year were you admitted</p>

<p style="text-align: right;">Page 22</p> <p>1 to -- strike that.</p> <p>2 Were you ever admitted to the</p> <p>3 state of Missouri?</p> <p>4 A. Yes.</p> <p>5 Q. And what year was that?</p> <p>6 A. I believe it was '90. '90 or</p> <p>7 '91.</p> <p>8 Q. So you sat for the bar exam</p> <p>9 in -- Missouri State Bar exam in 1988?</p> <p>10 A. Correct.</p> <p>11 Q. And your date of admission to</p> <p>12 the state of Missouri is 1990?</p> <p>13 A. '90 or '91. Correct.</p> <p>14 Q. How many times did you sit for</p> <p>15 the Missouri State Bar exam?</p> <p>16 A. Two or three.</p> <p>17 Q. Have you taken any other bar</p> <p>18 exams?</p> <p>19 A. No.</p> <p>20 Q. Are you admitted in any other</p> <p>21 states?</p> <p>22 A. No.</p> <p>23 Q. Upon your admission, did you</p> <p>24 practice law?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. I was a real estate manager.</p> <p>2 Q. Do you recall your title?</p> <p>3 A. Real estate manager.</p> <p>4 Q. And what was your general job</p> <p>5 duties as a real estate manager?</p> <p>6 A. It was a site selection job.</p> <p>7 And so we selected the sites for Walmart</p> <p>8 stores.</p> <p>9 Q. And where were you based at</p> <p>10 that time?</p> <p>11 A. Bentonville. Bentonville,</p> <p>12 Arkansas.</p> <p>13 Q. Thank you. Did the site</p> <p>14 selection process take into account the</p> <p>15 siting of pharmacies?</p> <p>16 MS. TABACCHI: Object to the</p> <p>17 form.</p> <p>18 THE WITNESS: It took into</p> <p>19 account the selection of Walmart</p> <p>20 buildings. Walmart stores.</p> <p>21 Q. (BY MR. INNES) Walmart retail</p> <p>22 locations?</p> <p>23 A. Correct.</p> <p>24 Q. Did those retail locations</p> <p>25 include pharmacies?</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Let's begin with -- well,</p> <p>2 strike that.</p> <p>3 Do you hold any other advanced</p> <p>4 degrees?</p> <p>5 A. No.</p> <p>6 Q. So this is a long period of</p> <p>7 time that we're going to cover now. I'd like</p> <p>8 to cover your employment history.</p> <p>9 A. Okay.</p> <p>10 Q. And I think we can probably</p> <p>11 move forward in time, but I'd like to get a</p> <p>12 record of your employment from '91 to</p> <p>13 present.</p> <p>14 We might stop along the way. I</p> <p>15 might want to investigate a little bit</p> <p>16 further, based on what you tell me. But we</p> <p>17 might be able to keep this moving pretty</p> <p>18 quickly.</p> <p>19 After you became admitted to</p> <p>20 the bar, in 1990 or '91, were you employed?</p> <p>21 A. Yes.</p> <p>22 Q. And where were you employed?</p> <p>23 A. Walmart.</p> <p>24 Q. And what was your role at</p> <p>25 Walmart in that time?</p>	<p style="text-align: right;">Page 25</p> <p>1 MS. TABACCHI: Object to the</p> <p>2 form.</p> <p>3 THE WITNESS: I -- I don't</p> <p>4 know.</p> <p>5 Q. (BY MR. INNES) Do you recall</p> <p>6 if Walmart had retail pharmacies in 1991?</p> <p>7 A. I don't recall.</p> <p>8 Q. How long did you hold the title</p> <p>9 of real estate manager?</p> <p>10 A. From '88 to -- '88 to '91.</p> <p>11 Q. So from 1988 to 1991, you were</p> <p>12 a real estate manager with Walmart here in</p> <p>13 Bentonville?</p> <p>14 A. Correct.</p> <p>15 Q. And during that same period of</p> <p>16 time, you were enrolled in a JD program; is</p> <p>17 that correct?</p> <p>18 MS. TABACCHI: Object to the</p> <p>19 form.</p> <p>20 THE WITNESS: Incorrect.</p> <p>21 Q. (BY MR. INNES) I'm sorry, I</p> <p>22 just want to make sure I have the record</p> <p>23 clear.</p> <p>24 My mistake. Let me clean that</p> <p>25 up so it's okay.</p>

<p>1        You graduated with a JD in 2 1988; is that correct? 3        A. Correct. 4        Q. And you passed -- you sat and 5 passed for the bar in '90 or '91. 6        A. Correct. 7        Q. And you were admitted in '90 or 8 '91? 9        A. Correct. 10      Q. And in 1988, you became a real 11 estate manager for Walmart? 12      A. Correct. 13      Q. And you held that title until 14 1991? 15      A. Correct. 16      Q. What was your next employment? 17      A. I -- for approximate -- I went 18 out to the store -- and I think they called 19 me a trainee -- but long story short, it was 20 much like an assistant manager job in the 21 store for eight months or so. 22      Q. And when you refer to "store," 23 that's a Walmart retail location? 24      A. Correct. 25      Q. In your role, in that assistant</p>	<p>Page 26</p> <p>1        role? 2        A. I held various roles in 3 merchandising. So that first role was 4 probably less than a year, probably less than 5 six months, that first role. 6        Q. Okay. In that first role, what 7 were the products that you were -- strike 8 that. 9        What was your -- can you 10 describe your role? 11      A. In the very first role in 12 merchandising, it was menswear. And it was 13 ball caps that I bought. 14      Q. All right. We can talk about 15 that off-line. 16      Following your role as a -- in 17 merchandising as a buyer of ball caps, what 18 was your next role? 19      A. It was a buyer in what we call 20 the infant department. 21      Q. In that role in the infant 22 department, what, if any, medical products 23 did you purchase? 24      A. None. 25      Q. Were you primarily purchasing</p>
<p>1 manager role, did you have any duties as it 2 related to -- strike that. 3        In that location, was there a 4 pharmacy? 5        A. There was. 6        Q. And in your role as an 7 assistant manager, did you have any duties 8 relating to that pharmacy? 9        A. So my role was not considered 10 an assistant manager. My role was considered 11 a trainee. I said it was like 12 responsibilities of an assistant manager. 13        And then to answer your 14 question, no, I did not have any 15 responsibility as it relates to the pharmacy. 16      Q. Thank you. 17      And after eight months as a 18 trainee, what was your next employ? 19      A. I was in merchandising as a 20 buyer. 21      Q. And your role as a buyer in 22 merchandising, was that back at the home 23 office? 24      A. Correct. 25      Q. And how long did you hold that</p>	<p>Page 27</p> <p>1        apparel for infants? 2        A. I purchased apparel. 3        Q. How long were you in that role? 4        A. Approximately three to four 5 years. 6        Q. Okay. After your role in 7 merchandising as a buyer for infants, what 8 was your next role? 9        A. It was a buyer in ladies' wear. 10      Q. And how long were you in that 11 position? 12      A. Approximately two, two and a 13 half years. 14      Q. And what was your next role? 15      A. It was a buyer in cosmetics and 16 skin care. 17      Q. And what was your role after 18 that? 19      A. I had a -- I was promoted to a 20 DMM in cosmetics and skin care. 21      Q. Just for the record, what does 22 DMM stand for? 23      A. Divisional merchandise manager. 24      Q. So you're no longer a buyer, 25 but you're a divisional merchandise manager?</p>

Page 30	Page 32
<p>1 A. Correct. 2 Q. Did your responsibilities 3 change at that point? 4 A. Yes, they did. 5 Q. And what was your role or 6 function as a divisional merchandise manager? 7 A. It was to oversee buyers that 8 bought product for the cosmetic and skin care 9 business. 10 Q. And how -- approximately how 11 long did you hold that title? 12 A. Approximately three and a half, 13 four years. 14 Q. And what was your next 15 position? 16 A. It was in supply chain, and it 17 was position of vice president over safety 18 and compliance of supply chain. 19 Q. Approximately what year did you 20 begin in that role? 21 A. I don't recall the year. I'd 22 have to do a math problem and figure it out, 23 but I don't recall the year. 24 Q. Maybe we can figure this one 25 out together. So in '91, you're a real</p>	<p>1 compliance. 2 Q. Okay. And what products was 3 that team responsible for, if any? 4 A. Products in the general 5 distributions -- or grocery distribution 6 center and regional distribution center and 7 apparel distribution center. [REDACTED]</p>
<p>1 estate manager. 2 A. From '88 to '91. 3 Q. Right. 4 A. Correct. 5 Q. And then from approximately '91 6 to maybe '92, you're a trainee assistant? 7 A. So collectively in 8 merchandising, I've spent about 15 years. 9 Q. Okay. So does that help you? 10 A. 15 years, and if I started in 11 '88 -- '98 -- probably -- approximately 2004, 12 if my math is right. 13 Q. So approximately 2004, you take 14 on the role of supply chain vice president, 15 safety and compliance. 16 A. Correct. 17 Q. And what were your 18 responsibilities in that role? 19 A. It was a safety -- it was to 20 lead the asset protection team. 21 Q. And what assets were you 22 protecting in that role? 23 A. The -- I wasn't protecting, but 24 it was to lead the team that protected. And 25 we called it asset protection, safety and</p>	<p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 MS. TABACCHI: Object to the 10 form. 11 Q. (BY MR. INNES) And I'll just 12 say this now before we get too far. We might 13 have sort of rapid-fire, faster exchanges. 14 If you can just pause, let your attorney 15 interpose an objection. 16 A. Yes, I got in a little hurry, 17 didn't I? 18 Q. Yeah. I suffer from the same 19 thing as well. So I will try to keep my pace 20 at a reasonable level so I don't egg you on. 21 The -- okay. So for how long 22 did you hold the role of vice president, 23 safety and compliance in supply chain? 24 A. Approximately three years. 25 Q. So 2007 time period?</p>

	Page 34	Page 36
1	A. Correct.	1 move forward to 2007. You're the vice
2	Q. What role did you take on after	2 president of -- well, I know I asked this
3	vice president, safety and compliance?	3 question again, but let's get it right for
4	A. It was over operations, so vice	4 the record.
5	president of operations over the Great Lakes.	5 In 2007, what was your title?
6	Q. I'm sorry, let me cycle back to	6 A. After the position of safety
7	your prior role as the vice president in	7 and compliance, I took the job of vice
8	safety and compliance.	8 president over operations of Great Lakes.
9	Who did you report to in 2004?	[REDACTED]
10	A. Johnny Dobbs.	[REDACTED]
11	Q. And for the record, do you --	[REDACTED]
12	can you spell Mr. Dobbs's last name?	[REDACTED]
13	A. I think it's -- I think it's	[REDACTED]
14	D-O-B-B-S.	[REDACTED]
15	Q. And during that timeframe, how	[REDACTED]
16	many people reported directly to you?	[REDACTED]
17	MS. TABACCHI: Object to the	[REDACTED]
18	form.	[REDACTED]
19	Sorry, are you talking about	[REDACTED]
20	2004?	[REDACTED]
21	MR. INNES: Yes.	[REDACTED]
22	THE WITNESS: Approximately	[REDACTED]
23	six?	[REDACTED]
24	Q. (BY MR. INNES) And in 2005,	[REDACTED]
25	who did you report to?	[REDACTED]
	Page 35	Page 37
1	A. When I was over operations? Is	[REDACTED]
2	that your question?	[REDACTED]
3	Q. In 2005, you held the title	[REDACTED]
4	supply chain vice president, safety and	[REDACTED]
5	compliance; is that right?	[REDACTED]
6	A. In 2000 --	[REDACTED]
7	Q. '5?	[REDACTED]
8	A. '5. Correct.	[REDACTED]
9	Q. Johnny Dobbs?	[REDACTED]
10	A. Johnny Dobbs.	[REDACTED]
11	Q. And was Mr. Dobbs also -- did	[REDACTED]
12	you report to Mr. Dobbs in 2006 as well?	[REDACTED]
13	A. Yes.	[REDACTED]
14	Q. And between 2004 and 2006, in	[REDACTED]
15	your role as a vice president, I think your	[REDACTED]
16	testimony is that for a portion of that time,	[REDACTED]
17	approximately six folks reported directly to	[REDACTED]
18	you.	[REDACTED]
19	A. Correct.	[REDACTED]
20	Q. Was that approximately the same	[REDACTED]
21	number of folks over the entire period of	[REDACTED]
22	time that you held that role?	[REDACTED]
23	MS. TABACCHI: Object to form.	23 Q. Does a regional distribution
24	THE WITNESS: Correct.	24 facility -- strike that.
25	Q. (BY MR. INNES) So now let's	25 In your role as a VP of

Page 38	Page 40
1 operations for the Great Lakes region, what,	[REDACTED]
2 if any, responsibility did you have for the	[REDACTED]
3 distribution of Schedule II substances?	[REDACTED]
4 A. None.	[REDACTED]
5 Q. During your time as a VP of	[REDACTED]
6 operations of the Great Lakes region, did	[REDACTED]
7 Walmart ever conduct training?	[REDACTED]
8 MS. TABACCHI: Object to the	[REDACTED]
9 form.	[REDACTED]
10 THE WITNESS: Can you be more	[REDACTED]
11 specific as it relates to training?	[REDACTED]
12 Q. (BY MR. INNES) Did you ever	[REDACTED]
13 attend any training as the vice president of	[REDACTED]
14 operations for Great Lakes related to your	[REDACTED]
15 role?	[REDACTED]
16 A. So clarification. Are you	[REDACTED]
17 talking internal training? External	[REDACTED]
18 training?	[REDACTED]
19 Q. Yeah, I think I'm going to	[REDACTED]
20 withdraw it. That's a horrible question.	[REDACTED]
21 A. What?	[REDACTED]
22 Q. That's a horrible question.	[REDACTED]
23 I'm going to withdraw it. We'll move on.	[REDACTED]
24 A. Okay.	[REDACTED]
25 Q. Where were you based as a vice	[REDACTED]

Page 39	Page 41
1 president of operations for Great Lakes?	[REDACTED]
2 A. Detroit. Livonia, to be	[REDACTED]
3 specific.	[REDACTED]
4 Q. How do you spell that name?	[REDACTED]
5 A. I don't know. Livonia,	[REDACTED]
6 Michigan.	[REDACTED]
7 Q. And Livonia is in proximity,	[REDACTED]
8 close proximity to Detroit?	[REDACTED]
9 A. Correct.	[REDACTED]
10 Q. Now, you said you were the vice	[REDACTED]
11 president of operations for the Great Lakes	[REDACTED]
12 region. Were there other vice presidents	[REDACTED]
13 for -- I'm sorry, strike that.	[REDACTED]
14 What other regions are there	[REDACTED]
15 for Walmart?	[REDACTED]
16 MS. TABACCHI: Object to the	[REDACTED]
17 form.	[REDACTED]
18 THE WITNESS: There are other	[REDACTED]
19 regions. I can't name them all, but	[REDACTED]
20 there are other regions.	[REDACTED]

[REDACTED]	Page 42 [REDACTED] Page 44 [REDACTED] 20 Q. (BY MR. INNES) So did your 21 title change at any time after 2007? 22 A. At any time after 2007. From 23 now to present -- or from 2007 to present? 24 Q. That's a fair point. I 25 appreciate the clarification.
[REDACTED]	Page 43 [REDACTED] Page 45 [REDACTED] 1       What role did you take on after 2 the vice president, if any? 3       A. So I had a -- a took on -- 4 after -- in the chronological that you're 5 talking. 6       Q. Yes. 7       A. After the vice president of the 8 Great Lakes, then I was the divisional vice 9 president of Central Plains. 10      Q. And what year was that? 11      A. Well, it was right after -- it 12 was two years after the Great Lakes. 13      Q. So beginning sometime 2009? 14      A. Correct. '9 or '10.

[REDACTED]	<p>Page 46</p> <p>1 A. What I mean is if there were 2 any issues of product coming through the RDC 3 or GDC, I had teams that managed through 4 those -- managed through those issues. 5 Q. And what do you mean by -- 6 A. And -- 7 Q. I'm sorry. 8 A. Go ahead. 9 Q. I try not to cut you off, so I 10 apologize if I did. 11 If I do cut you off and you 12 want to continue speaking, please do. 13 What do you mean by "issues"? 14 A. So if a supplier were to ship 15 in product that was more product than the 16 PO -- the PO called for, then my team had to 17 help resolve that. 18 Q. Does "PO" mean purchase order? 19 A. Correct. 20 Q. How long did you hold this role 21 of VP supply chain services? 22 A. Approximately three and a half 23 years. 24 Q. Sometime in the area of 2014, 25 2015 is when you ended that position?</p>
[REDACTED]	<p>Page 47</p> <p>1 Q. And by "operations," which role 2 are you referring to? 3 A. I'm referring to the 4 Great Lakes and Central Plains jobs. 5 Q. Okay. I'm going to try to help 6 us through the math problem together. The 7 operations position started in 2007. You 8 think you were there for about four years 9 over those two roles. So now we're -- 10 A. A little over, but yes. 11 Q. So about 2011 -- 12 A. Correct. 13 Q. -- you take on the vice 14 president of supply chain services? 15 A. Yes. Vice president of supply 16 chain services. 17 Q. And can you describe your 18 responsibilities and duties in that role? 19 A. It was a solution-based team. 20 And so I managed several solution-based teams 21 predominantly for the flow of merchandise 22 through the RDCs and GDCs. 23 Q. Okay. Let's break that down a 24 little bit. What do you mean by 25 "solution-based team"?</p> <p>Page 49</p> <p>1 A. No. It would have to be -- I 2 had to end that sometime in the neighborhood 3 of '17, wasn't it? '17, '18, '19 because 4 I've been in this role a year and a half. So 5 it had to be sometime in that neighborhood of 6 '17. 7 Q. Maybe I can help us out here. 8 A. Yeah. 9 Q. So what's the next role that 10 you took on? 11 A. So then the next role is vice 12 president over pharmacy. So I went from the 13 supply chain services to pharmacy. 14 Q. Okay. 15 A. Network pharmacy. And it 16 wasn't just pharmacy, it's health and 17 wellness. So health and wellness and print 18 solutions. 19 Q. Okay. Is that your current 20 title? 21 A. Correct. 22 Q. I have your current title as 23 vice president, health and wellness, PM DC 24 supply chain. 25 A. Right. So that's print</p>

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<p>1 solutions.</p> <p>2 And I don't know what PM DC</p> <p>3 stands for, but it's the old nomenclature for</p> <p>4 print solutions.</p> <p>5 Q. So anytime I see PM DC --</p> <p>6 A. It's print solutions.</p> <p>7 Q. Okay. They're synonymous?</p> <p>8 A. Correct.</p> <p>9 Q. Thank you.</p> <p>10 That might help us out later.</p> <p>11 I appreciate that.</p> <p>12 A. Okay.</p> <p>13 Q. So vice president, health and</p> <p>14 wellness, PM DC supply chain.</p> <p>15 A. Correct.</p> <p>16 Q. Is it better for me to refer to</p> <p>17 that as "vice president, health and wellness,</p> <p>18 print solutions"?</p> <p>19 A. It's either one is fine.</p> <p>20 Q. Okay.</p> <p>21 Did you take on that position</p> <p>22 in June of 2017? Is that correct?</p> <p>23 A. That is correct.</p> <p>24 Q. So now I just want to make sure</p> <p>25 I have the timeline right.</p>	<p>1 half, I was in merchandising roughly 15, and</p> <p>2 I've been in distribution roughly 15.</p> <p>3 So if you add -- or, let's see.</p> <p>4 So that's not quite right. So I was in</p> <p>5 merchandising and real estate approximately</p> <p>6 15, and then I've been in supply chain</p> <p>7 approximately 13 to 15, I guess.</p> <p>8 Q. So all in, somewhere between 28</p> <p>9 and 30 years as a Walmart employee?</p> <p>10 A. I just hit my 30-year, right.</p> <p>11 Q. All right. Congratulations.</p> <p>12 A. So there's a math problem.</p> <p>13 Q. There's a math problem. We're</p> <p>14 doing algebra at this point.</p> <p>15 A. A little complicated.</p> <p>16 Q. All right. So let's go back to</p> <p>17 the title you had immediately before your</p> <p>18 present title.</p> <p>19 A. Okay.</p> <p>20 Q. And that's the vice president</p> <p>21 of supply chain services.</p> <p>22 A. Correct.</p> <p>23 Q. Were there any regional</p> <p>24 limitations on that role or was that a</p> <p>25 national role?</p>
<p>1 So immediately prior to your</p> <p>2 current title, you were the vice president of</p> <p>3 supply chain services?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. And we believe that ran</p> <p>6 from approximately 2011 until June of '17?</p> <p>7 A. There's something not right</p> <p>8 with that math. Because I -- it was only</p> <p>9 about three and a half years. So we'll have</p> <p>10 to back up through there.</p> <p>11 Q. Well, maybe we're missing a</p> <p>12 role.</p> <p>13 A. I don't think we're -- we</p> <p>14 haven't missed any roles.</p> <p>15 Q. Okay.</p> <p>16 A. We might have -- I don't know</p> <p>17 that we've added the math up correctly. I</p> <p>18 haven't been -- I don't have a tally sheet</p> <p>19 here, but ...</p> <p>20 Q. Okay. I'm relying on you for</p> <p>21 that. And I'm relying on the time frames</p> <p>22 you're giving me.</p> <p>23 A. So to put an easy math problem,</p> <p>24 I was in merchandising roughly 15 years. So</p> <p>25 I was in real estate roughly three and a</p>	<p>1 A. Were there any -- repeat the</p> <p>2 question?</p> <p>3 Q. Was there --</p> <p>4 Prior to your role, as you</p> <p>5 mentioned, you had responsibility over a</p> <p>6 particular region.</p> <p>7 I'm wondering if, in the role</p> <p>8 of vice president of supply chain services,</p> <p>9 you were also limited to a particular region.</p> <p>10 A. No. It covered all RDCs and</p> <p>11 GDCs.</p> <p>12 Q. And by "all," you mean</p> <p>13 nationally?</p> <p>14 A. Correct.</p> <p>15 Q. Were there any international</p> <p>16 facilities you had --</p> <p>17 A. No.</p> 

5 Q. In June of 2017, you take on  
6 the role of vice president, health and  
7 wellness, print solutions.

8 A. Correct.

9 Q. What were your job  
10 responsibilities -- what are your job  
11 responsibilities?

12 A. It's to oversee the  
13 distribution of -- the distribution of the  
14 distribution centers. And it's also to  
15 oversee the operation of the optical  
16 distribution center.

17 Q. And are you describing your  
18 role present day?

19 A. Correct.

20 Q. Okay. So I want to maybe  
21 refocus my question.

22 A. Okay.

23 Q. In June of '17, what were your  
24 responsibilities?

25 A. It was to oversee the operation

15 Q. Okay. Thank you.

16 In response to one of my  
17 earlier questions, I think you said the  
18 "distribution of the distribution centers."

19 A. Yes. I misspoke.

20 Q. Okay. All right.

21 A. I meant to say the "operation  
22 of the distribution centers."

23 Q. Okay. Thank you.

24 Is it operation of the pharmacy  
25 distribution centers?

1 of the distribution center. The  
2 distribution -- the pharmacy distribution  
3 centers. And it was to oversee the operation  
4 of the optical distribution centers. And it  
5 was to oversee the operation of print  
6 solutions.

1 A. Correct.

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[REDACTED]

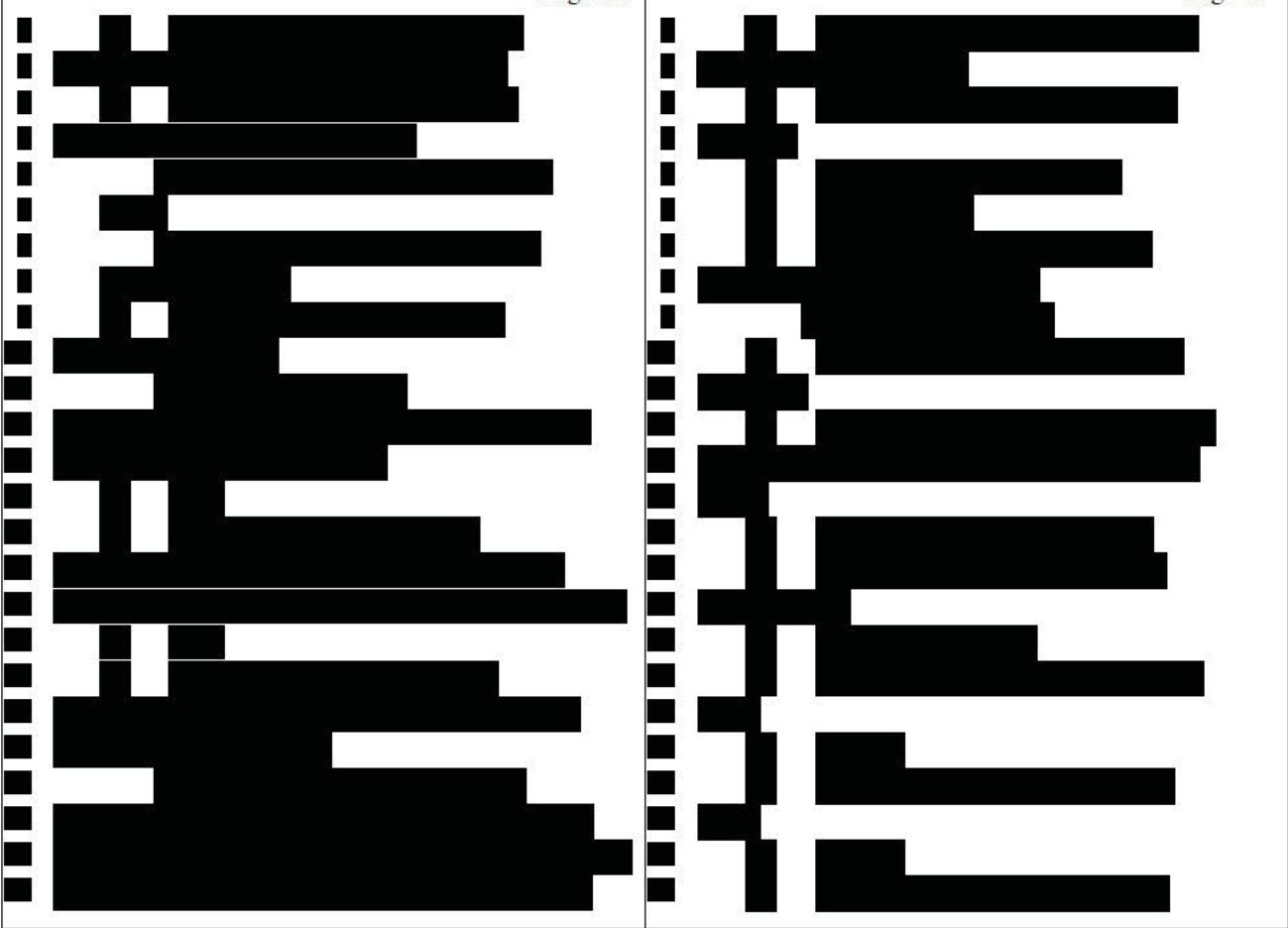
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[REDACTED]

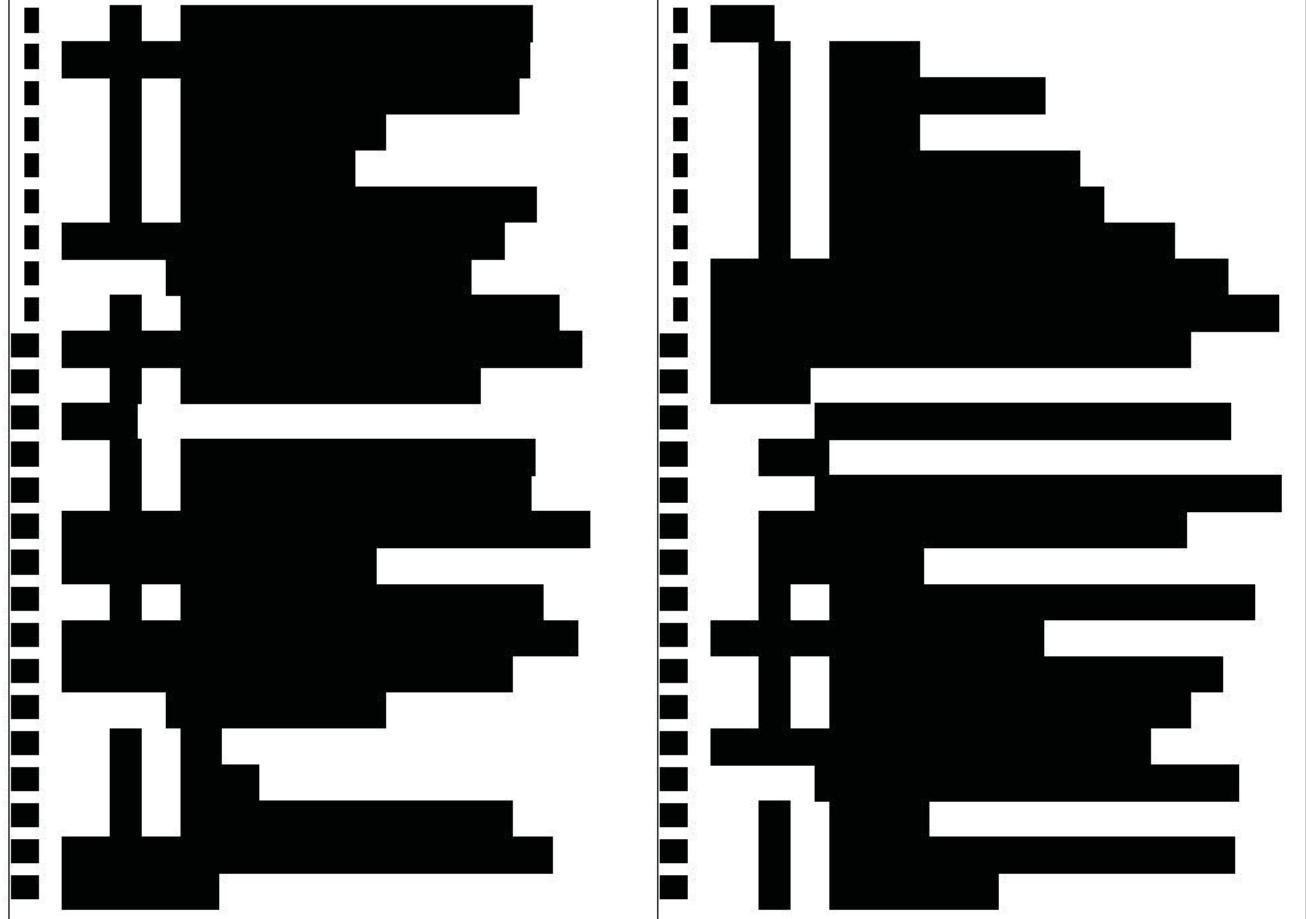
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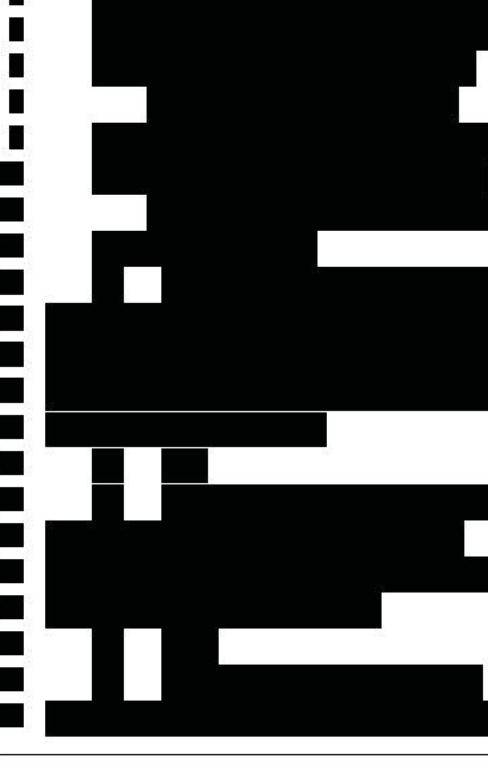
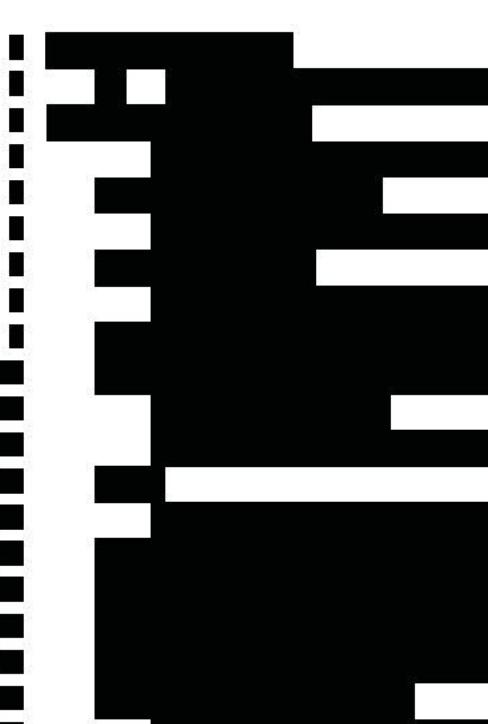
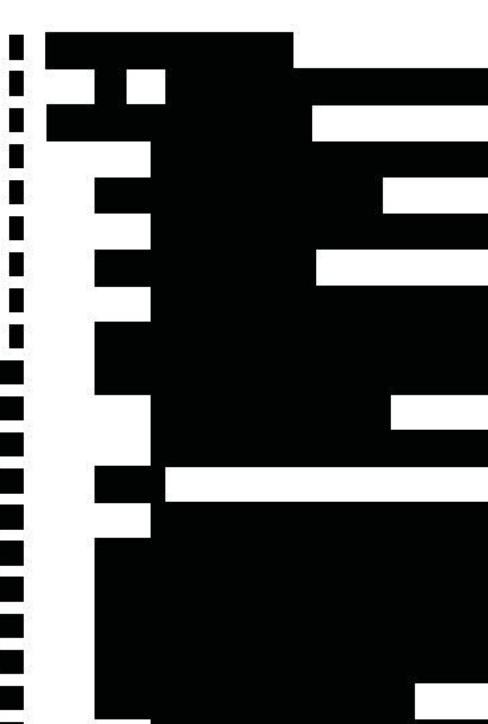
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<p>1 A. Early experience. That's 2 right.</p> <p>3 Q. The second case, did that 4 involve a raccoon as well?</p> <p>5 I'll strike that.</p> <p>6 The second case you sat for a 7 deposition, what was the nature of that case?</p> <p>8 A. There was a real estate case 9 with Walmart.</p> <p>10 Q. Okay. And was Walmart the 11 plaintiff or the defendant in that case?</p> <p>12 A. Defendant.</p> <p>13 Q. And did this case take place 14 during the time period where you were in the 15 real estate division at Walmart?</p> <p>16 A. I don't -- don't know that the 17 case took place while I was in the real 18 estate. It was about the real estate.</p> <p>19 Q. Okay.</p> <p>20 A. It was about a deal.</p> <p>21 Q. All right. And what was the 22 exact -- strike that.</p> <p>23 You were not a party to that 24 litigation, were you?</p> <p>25 MS. TABACCHI: Object to the</p>	<p>Page 74</p> 
<p>1 form.</p> <p>2 Q. (BY MR. INNES) You were not 3 named as a defendant in that case?</p> <p>4 A. No.</p> <p>5 Q. Okay. Let's go back closer to 6 present day.</p> <p>7 June of 2017 is when you took 8 on the role of vice president, health and 9 wellness, printing solutions; is that right?</p> <p>10 A. Correct.</p> 	<p>Page 75</p> <p>Page 77</p> 

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Page 80

[REDACTED]

Page 79

Page 81

[REDACTED]

Page 82	Page 84
[REDACTED]	[REDACTED]

Page 86	Page 88
[REDACTED]	[REDACTED]



Page 94	Page 96
[Redacted content]	[Redacted content]

Page 98	Page 100
<p>1 MS. TABACCHI: I'm just going 2 to object to the form and again 3 caution the witness not to reveal the 4 substance of communications with 5 counsel.</p> <p>6 You may answer the question if 7 you can do that without revealing a 8 privilege.</p> <p>9 MR. INNES: Before you answer, 10 I just want to respond to the 11 privilege instruction.</p> <p>12 I'm not sure that I understand 13 your privilege instruction. She's 14 certainly -- do you want to articulate 15 that a little bit better?</p> <p>16 MS. TABACCHI: You're asking 17 the witness to share her 18 understanding -- you've been asking a 19 number of questions of an obligation 20 that you consider to be a legal 21 obligation. You're asking the witness 22 about her understanding of a legal 23 obligation that the company had. And 24 to the extent that she has an 25 understanding based on conversations</p>	<p>1 I think that's what you just said. 2 MR. INNES: So we have an order 3 in this case from Judge Polster that 4 discusses the metes and bounds of 5 privilege as it relates to suspicious 6 order monitoring. My questions are 7 directed at Walmart's suspicious order 8 monitoring program.</p> <p>9 MS. TABACCHI: You are free to 10 ask any question about what Walmart 11 did, what Walmart's program was, what 12 Walmart's policies were. I'm just 13 asking that you not ask about 14 conversations between the witness and 15 the lawyers that are protected by the 16 attorney-client privilege.</p> <p>17 If you want to ask about what 18 Walmart's suspicious order monitoring 19 policies were, process, program, yes. 20 Ask those questions. We're not trying 21 to prevent you from getting that 22 information. We're just not going to 23 have witnesses testify about the 24 conversation with a lawyer.</p> <p>25 MR. INNES: And I'm not asking</p>
<p>1 with counsel, those communications 2 would be privileged.</p> <p>3 So I just don't want her to 4 share information that she learned 5 from lawyers.</p> <p>6 She can answer the question. 7 I'm just trying to protect the 8 privilege of the company.</p> <p>9 MR. INNES: But you understand 10 that in her role, she is responsible 11 for Walmart -- carrying out Walmart's 12 compliance with --</p> <p>13 THE WITNESS: No.</p> <p>14 MR. INNES: -- the Controlled 15 Substances Act.</p> <p>16 MS. TABACCHI: Okay. Well, 17 there's not a question pending, but I 18 think that's part of the confusion is 19 that you're making some assumptions.</p> <p>20 MR. INNES: I don't think 21 there's any confusion here at all. 22 But we can take the answer to the 23 question.</p> <p>24 MS. TABACCHI: You're presuming 25 that she had a compliance obligation.</p>	<p>1 about conversations with a lawyer. 2 MS. TABACCHI: Okay. 3 MR. INNES: I can preface each 4 one of these questions that I'm not 5 interested in conversations with a 6 lawyer. I'm only interested in her 7 understanding of the obligations that 8 she had to carry out. That's the 9 question.</p> <p>10 THE WITNESS: So, the question? 11 MS. TABACCHI: Hold on. Wait 12 until he asks you a question. 13 Are you and I finished? 14 MR. INNES: I'm finished, 15 unless you -- 16 MS. TABACCHI: No, no, that's 17 fine.</p> <p>18 MR. INNES: Now I've had a long 19 colloquy. I'm going to have trouble 20 finding this question. Bear with me 21 for a second here.</p> <p>22 MS. TABACCHI: It's okay. Just 23 wait until he asks you a question, 24 then you can answer it. 25 [REDACTED]</p>
Page 99	Page 101

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Page 102

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Page 105

A horizontal bar chart showing the percentage of respondents who have heard of various terms. The y-axis lists the terms, and the x-axis shows the percentage from 0% to 100% in 10% increments. The bars are black and are separated by vertical dashed grid lines.

Term	Percentage
Alzheimer's disease	98
Stroke	95
Heart attack	92
Diabetes	88
Arthritis	85
Obesity	82
Hypertension	78
Stroke prevention	75
Stroke awareness	72
Stroke risk factors	68
Stroke symptoms	65
Stroke treatment	62
Stroke prevention	58
Stroke awareness	55
Stroke risk factors	52
Stroke symptoms	48
Stroke treatment	45
Stroke prevention	42
Stroke awareness	38
Stroke risk factors	35
Stroke symptoms	32
Stroke treatment	28
Stroke prevention	25
Stroke awareness	22
Stroke risk factors	18
Stroke symptoms	15
Stroke treatment	12
Stroke prevention	8
Stroke awareness	5
Stroke risk factors	2
Stroke symptoms	1
Stroke treatment	0

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Page 108

A 2D grayscale image showing a highly noisy, abstract pattern. The pattern consists of several thick, dark horizontal and vertical bars of varying lengths. A vertical column of black squares is located on the far left. The image is mostly black with white noise pixels scattered throughout.

A horizontal bar chart illustrating the percentage of patients with various comorbidities. The y-axis lists the comorbidities, and the x-axis represents the percentage, ranging from 0% to 100% in 10% increments. The bars are dark grey.

Comorbidity	Percentage (%)
None	100
1 comorbidity	~95
2 comorbidities	~85
3 comorbidities	~75
4 comorbidities	~65
5 comorbidities	~55
6 comorbidities	~45
7 comorbidities	~35
8 comorbidities	~25
9 comorbidities	~15
10 comorbidities	~5
11 comorbidities	~2
12 comorbidities	~1
13 comorbidities	~0.5
14 comorbidities	~0.2
15 comorbidities	~0.1
16 comorbidities	~0.05
17 comorbidities	~0.02
18 comorbidities	~0.01
19 comorbidities	~0.005
20 comorbidities	~0.002
21 comorbidities	~0.001
22 comorbidities	~0.0005
23 comorbidities	~0.0002
24 comorbidities	~0.0001
25 comorbidities	~0.00005

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[REDACTED]

Page 111

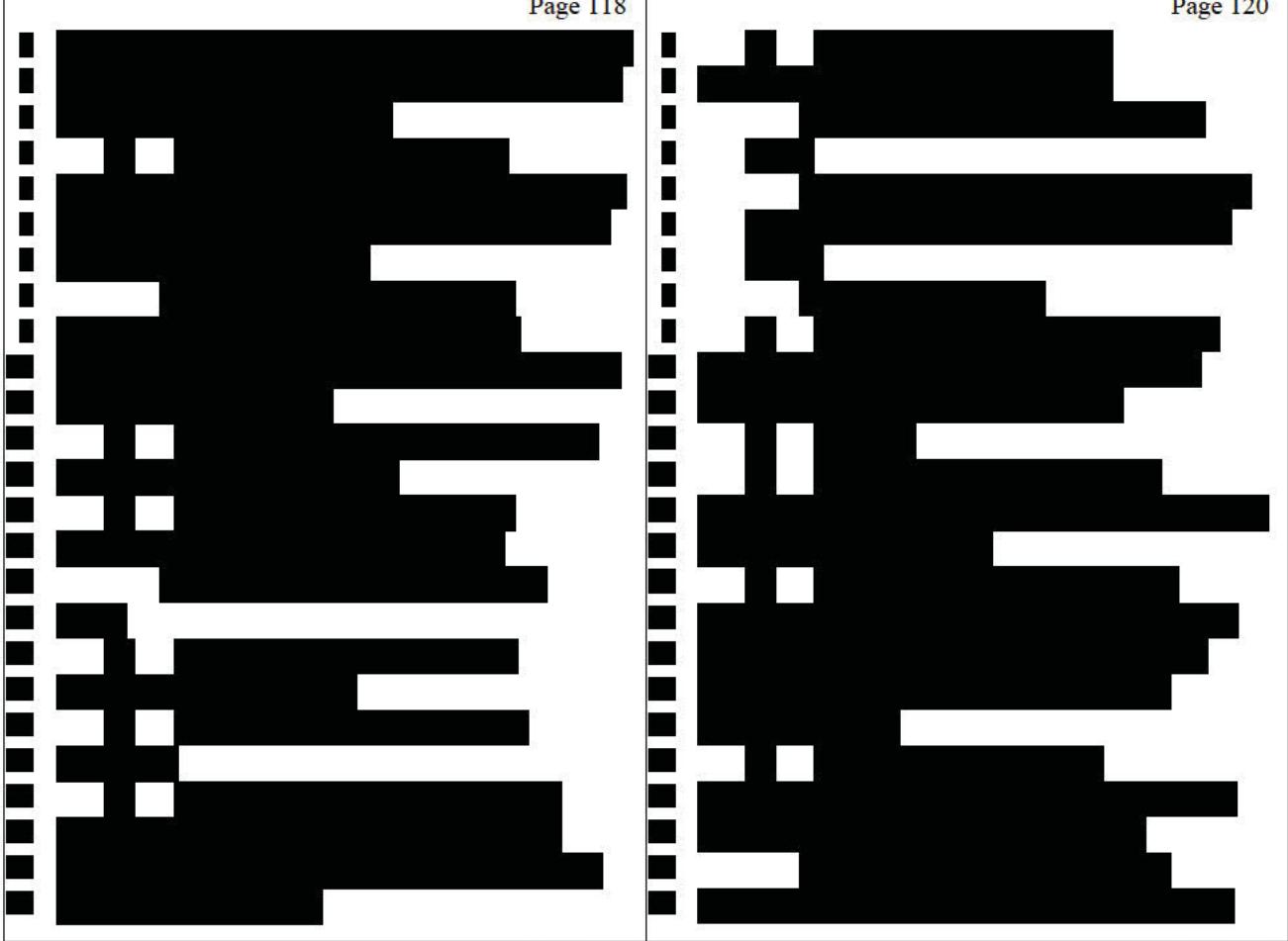
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[REDACTED]

Page 114	Page 116
[REDACTED]	[REDACTED]

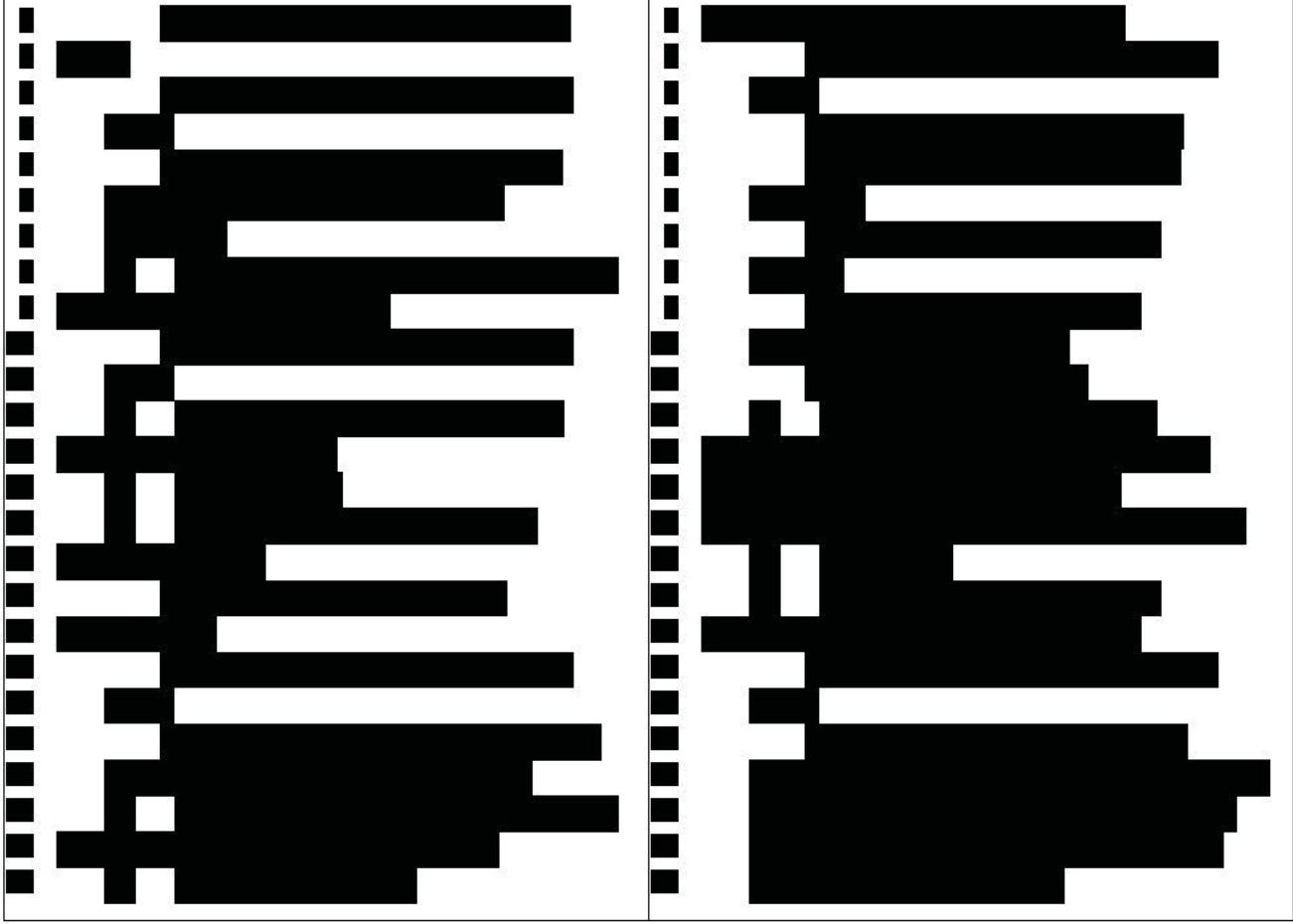
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Page 121



Page 122	Page 124
[REDACTED]	[REDACTED]

Page 126

13 MS. TABACCHI: Let us know,  
14 Mike, whenever it's a good time to  
15 take another break. If you're in the  
16 middle of something, you know, go  
17 ahead.

18 MR. INNES: Let me just ask two  
19 questions, see if we can't nail down  
20 the rest of this process, and then we  
21 can take a break.

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13 MS. TABACCHI: Let us know,  
14 Mike, whenever it's a good time to  
15 take another break. If you're in the  
16 middle of something, you know, go  
17 ahead.

18 MR. INNES: Let me just ask two  
19 questions, see if we can't nail down  
20 the rest of this process, and then we  
21 can take a break.

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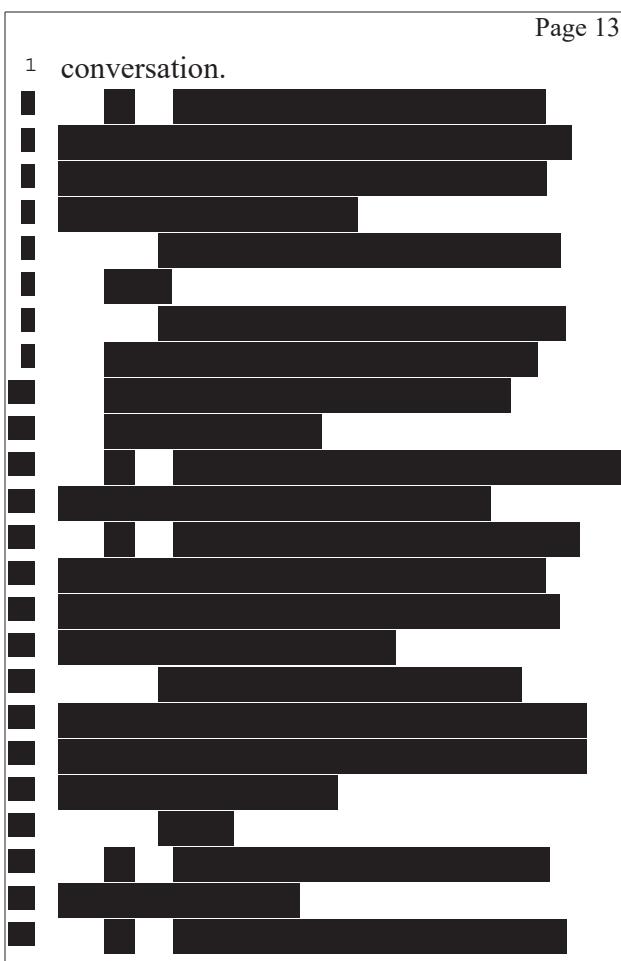
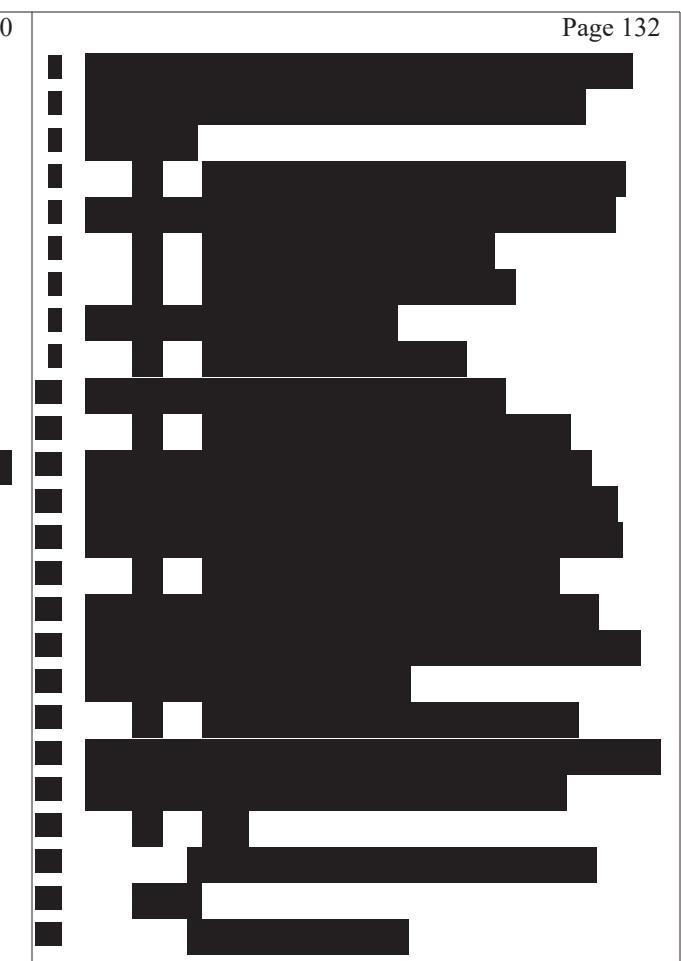
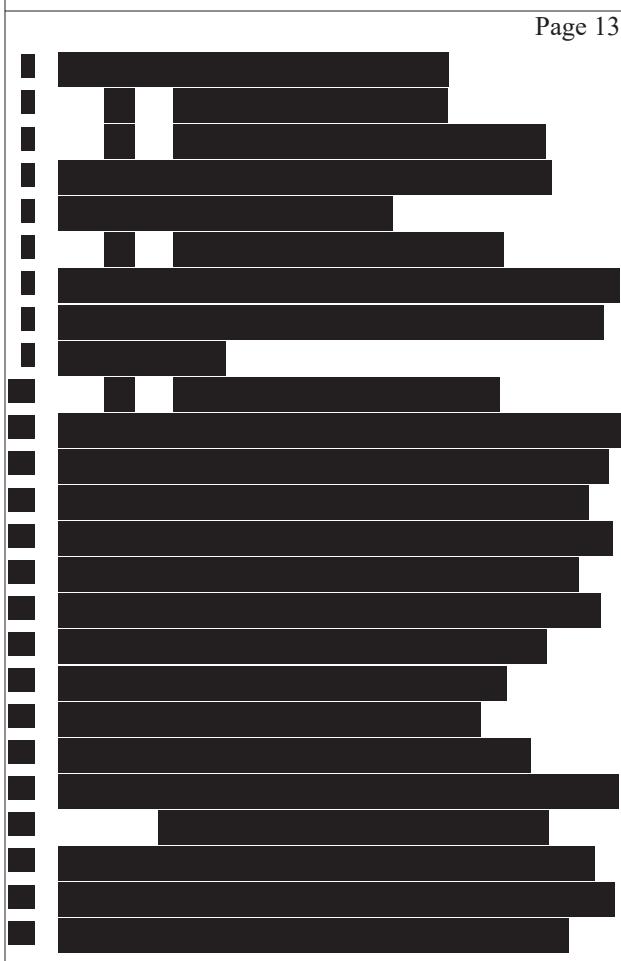
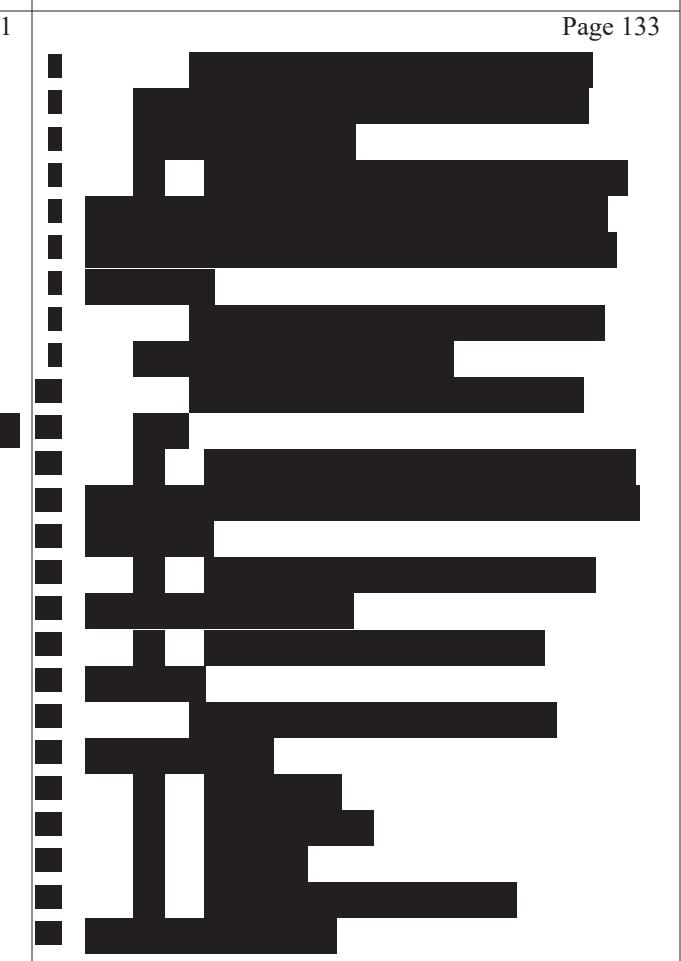
13 MS. TABACCHI: Let us know,  
14 Mike, whenever it's a good time to  
15 take another break. If you're in the  
16 middle of something, you know, go  
17 ahead.

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21 Q. And at this point in time,  
22 you're aware that the United States is  
23 undergoing an opioid crisis; is that right?  
24 A. Yeah. I think we established  
25 that in the very beginning of this

Page 33 (126 - 129)

<p>1 conversation.</p> 	<p>Page 130</p> 
	<p>Page 132</p> 

Page 134	Page 136
[Redacted content]	[Redacted content]

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Page 140

1 MR. INNES: I'm sorry. We --  
2 MS. TABACCHI: You were on a  
3 roll?  
4 MR. INNES: Yeah, we can take  
5 one now. Yeah, I just got on a roll.  
6 THE VIDEOGRAPHER: 10:49. We  
7 are off the video record.  
8 (Recess taken, 10:49 a.m. to  
9 11:08 a.m.)  
10 THE VIDEOGRAPHER: 11:08. We  
11 are on the video record.  
12 Q. (BY MR. INNES) Okay.  
13 Ms. Hodges, we're back on the record.

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23 MS. TABACCHI: Michael, we  
24 asked for a break a few minutes ago.  
25 Are you close?

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[REDACTED]

Page 143

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[REDACTED]

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Page 152

A high-contrast, black and white image showing a large, irregular black shape on a white background. The black shape has several white rectangular cutouts of varying sizes, particularly on the left and right sides. A vertical dashed line is on the far left, and a small circular logo is in the top right corner.

This figure displays a 2D grayscale image with a black border. Inside, there is a sequence of horizontal bars. The bars are black on top and white on the bottom. They are arranged in a staggered pattern, with each bar being slightly shorter than the one above it. On the far left, there is a vertical dashed line of black squares. The image is oriented vertically on the page.

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Page 153

A high-contrast, black and white image showing a series of horizontal bars of varying lengths. The bars are arranged in a staggered pattern, creating a sense of depth. A vertical dashed line is on the left, and a solid black bar is at the bottom right.

A horizontal bar chart with 15 bars. The bars are black with white outlines. The lengths of the bars decrease from left to right. The first bar is the longest, followed by a short bar, then a medium bar, then a long bar, then a short bar, then a medium bar, then a long bar, then a short bar, then a medium bar, then a long bar, then a short bar, then a medium bar, then a long bar, then a short bar, then a medium bar, and finally a long bar. The bars are set against a white background with a vertical dashed line on the left side.

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
	[REDACTED]

Page 158	Page 160
[Redacted content]	[Redacted content]

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Page 164

[REDACTED]

Page 163

Page 165

[REDACTED]

Page 166

Page 168

Page 167

Page 169

15 MS. TABACCHI: I'm sorry, could  
16 you say that -- could you just repeat  
17 that? I didn't --

18 MR. INNES: I can rephrase it,  
19 if that's the objection. Or if there  
20 is an objection.

21 MS. TABACCHI: I couldn't hear  
22 you. I'm sorry, I just couldn't hear  
23 you.

Page 170	Page 172
[REDACTED]	<p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p> <p>MS. TABACCHI: Michael, let me know whenever you're ready to break for lunch. I know our food is out there.</p> <p>MR. INNES: Let me see if I can't just close out this line. It might take 15 to 20. Unless you guys are hungry and you want to take a break now, we can do that. It's --</p> <p>MS. TABACCHI: Okay.</p> <p>MR. INNES: I'm leaving it in your hands. However you want to do it.</p> <p>MS. TABACCHI: I mean, if you</p> <p>have 20 more minutes, I'd just as soon take a break. But if you have a few more minutes --</p> <p>MR. INNES: That's okay. No, we can take a break.</p> <p>MS. TABACCHI: Okay.</p> <p>THE VIDEOGRAPHER: 11:46. We are off the video record.</p> <p>(Recess taken, 11:46 a.m. to 12:38 p.m.)</p> <p>THE VIDEOGRAPHER: 12:38. We are on the video record.</p> <p>Q. (BY MR. INNES) Good afternoon, Ms. Hodges. We're back on the record. You understand you're still under oath?</p> <p>A. Correct. Yes.</p>

Page 174	Page 176
[REDACTED]	[REDACTED]

Page 178	Page 180
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Page 179	Page 181
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Page 182	Page 184
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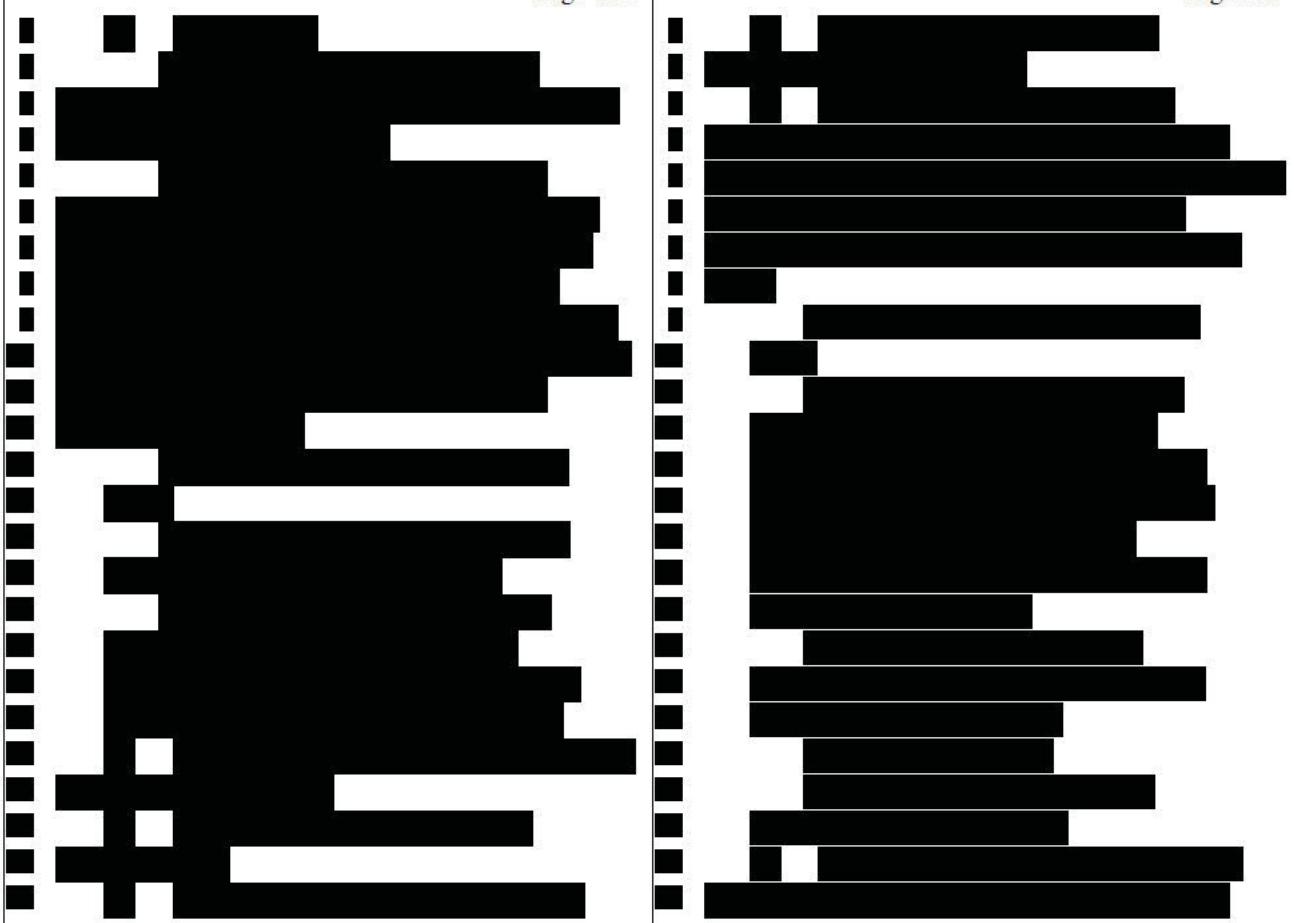


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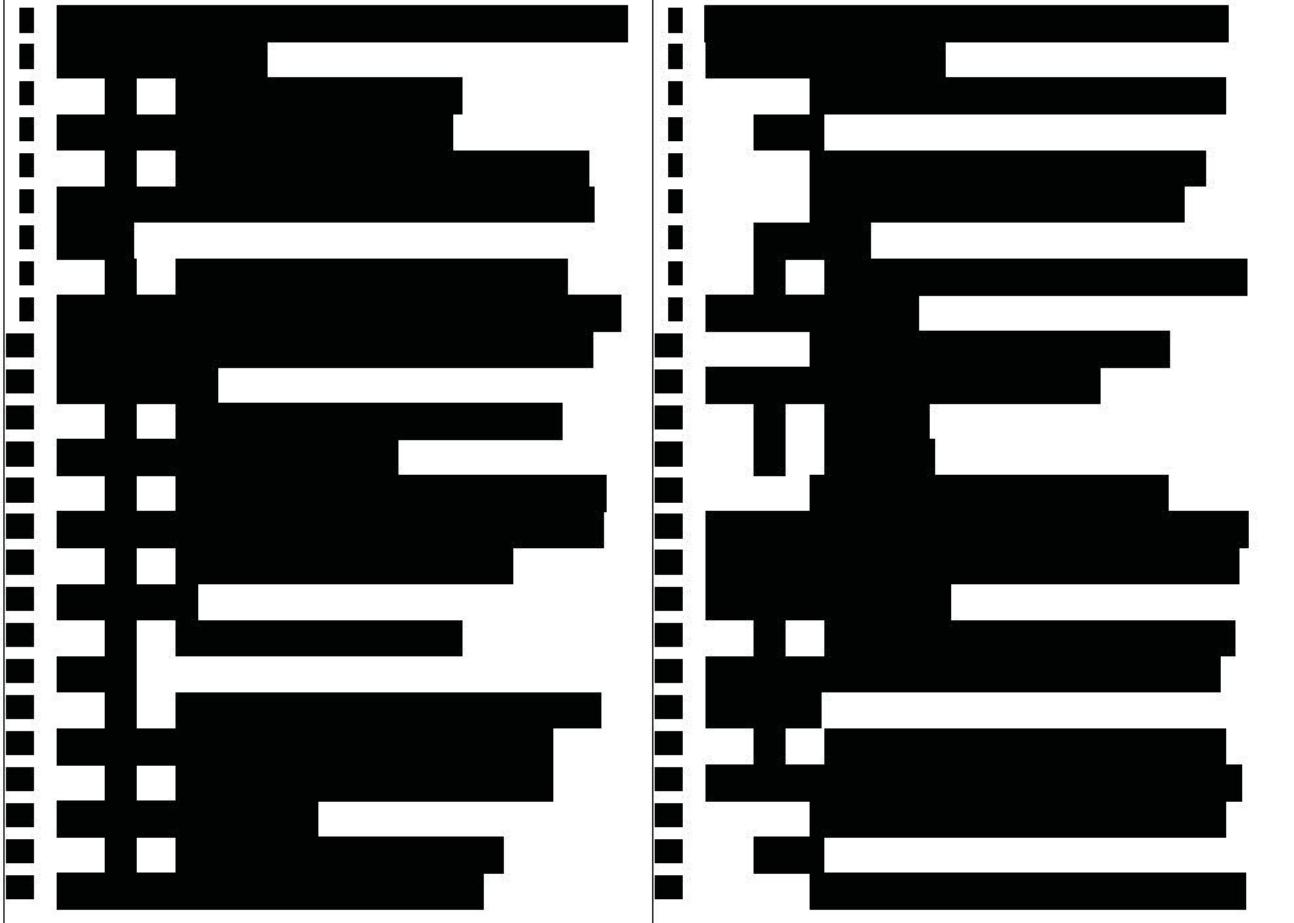
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Page 214	Page 216
[Redacted content]	[Redacted content]
Page 215	Page 217

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Page 220

5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 MS. TABACCHI: Mike, whenever  
9 you're at a good point for a quick  
10 break, let me know.

11 MR. INNES: Do you want to take  
12 five right now?

13 MS. TABACCHI: Sure.

14 MR. INNES: Okay.

15 THE VIDEOGRAPHER: 1:31. We  
16 are off the video record.

17 (Recess taken, 1:31 p.m. to  
18 1:36 p.m.)

19 THE VIDEOGRAPHER: 1:36. We  
20 are on the video record.

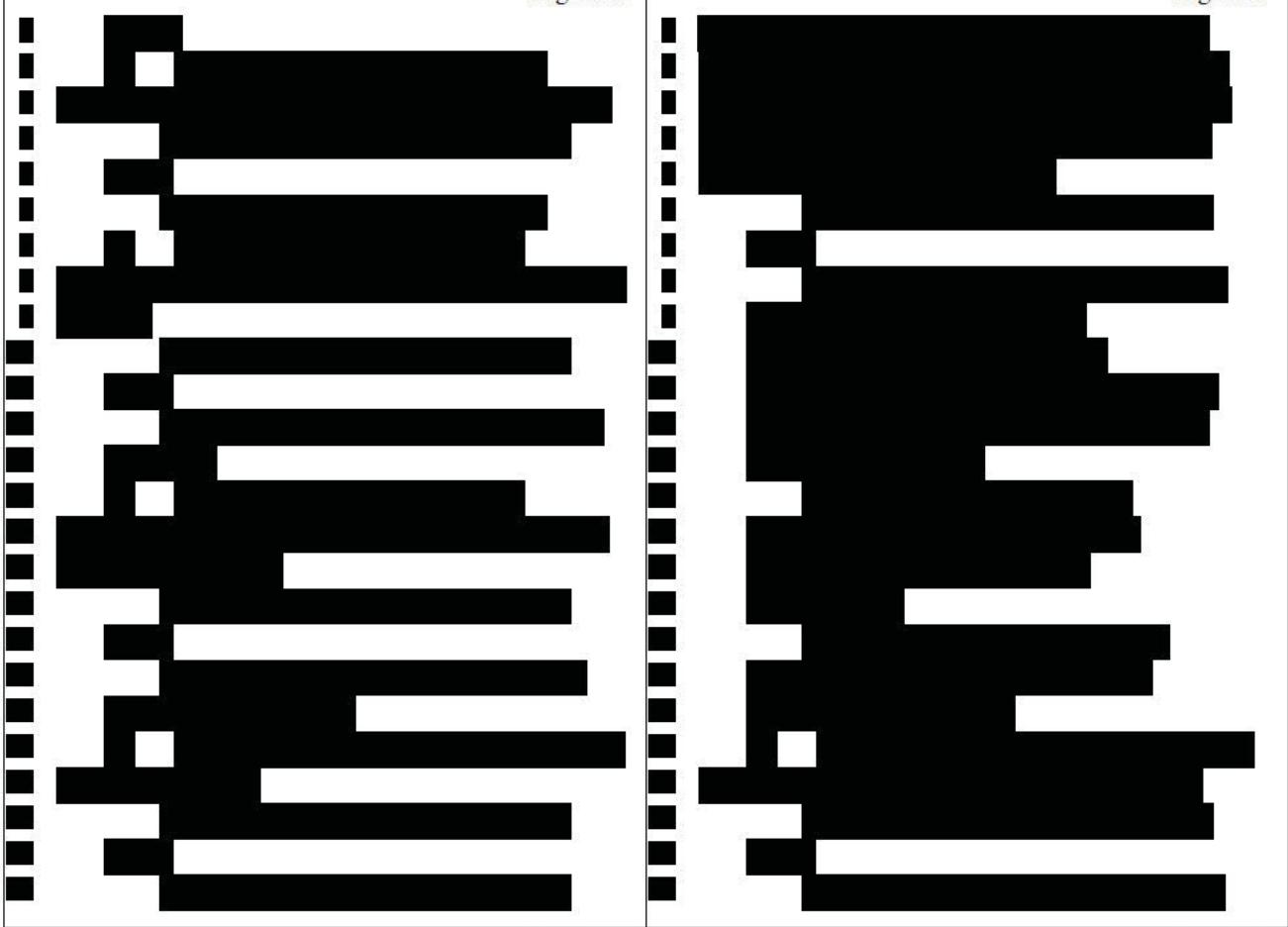
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Page 223	Page 225

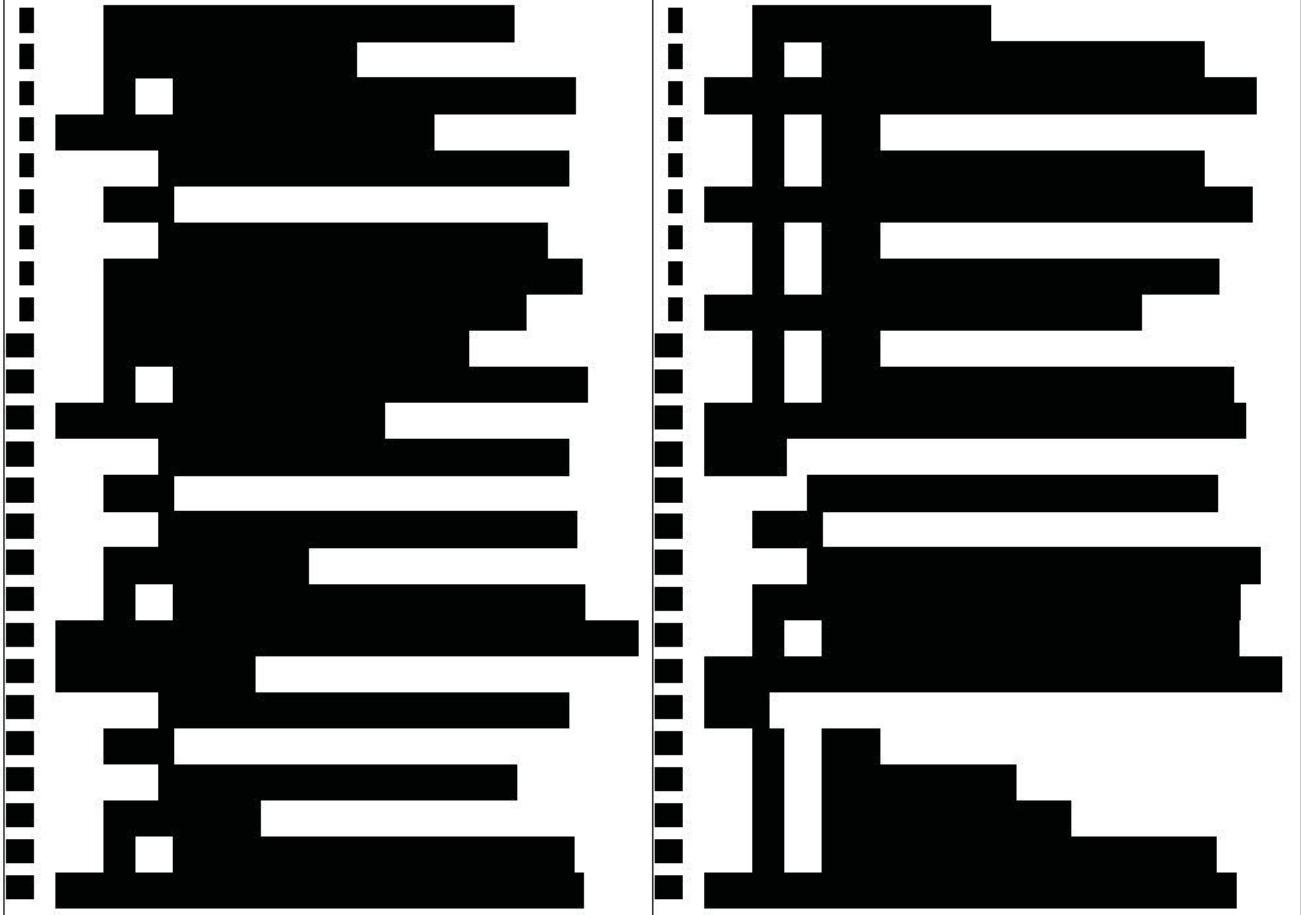
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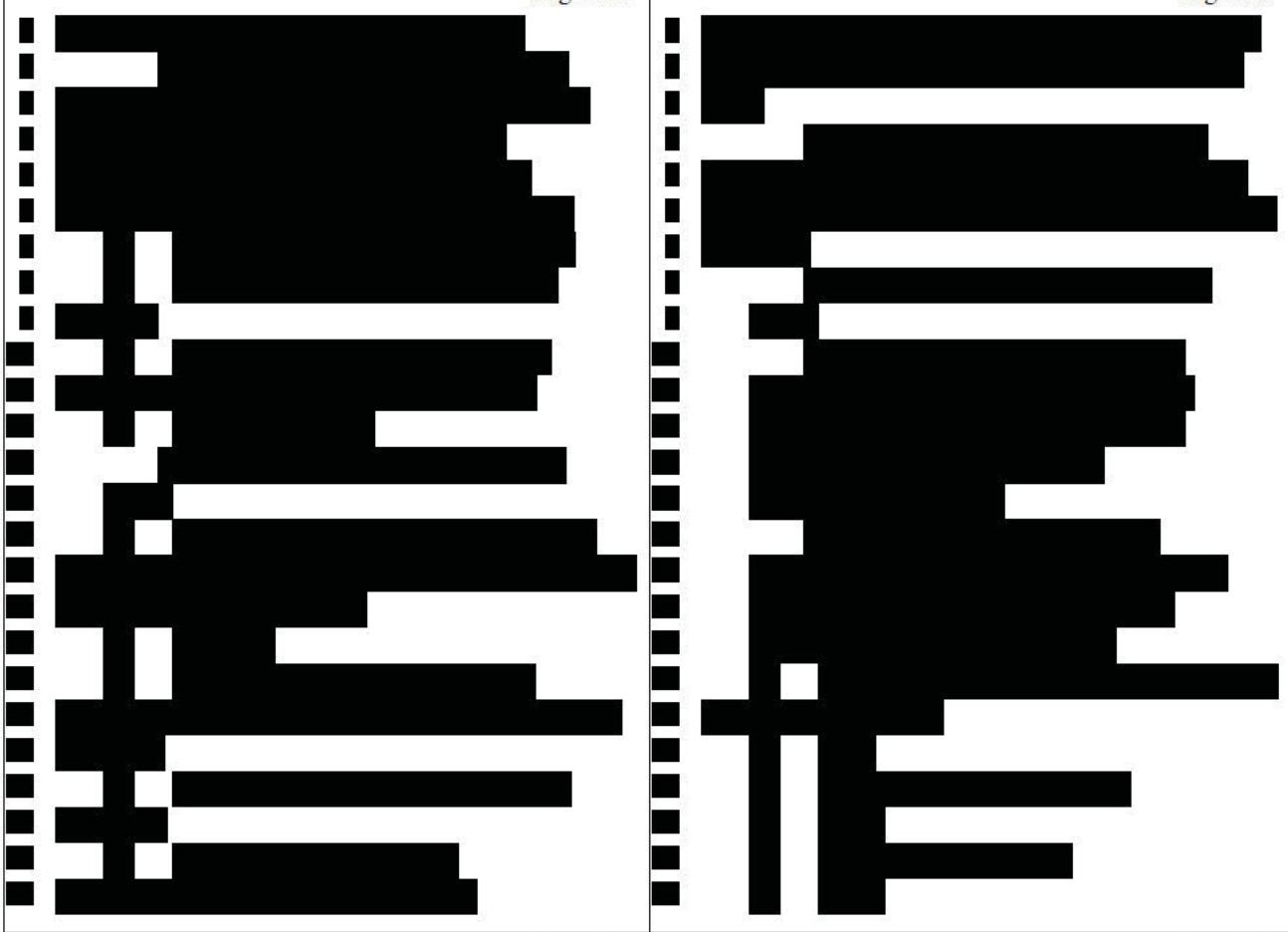
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Page 243	Page 245

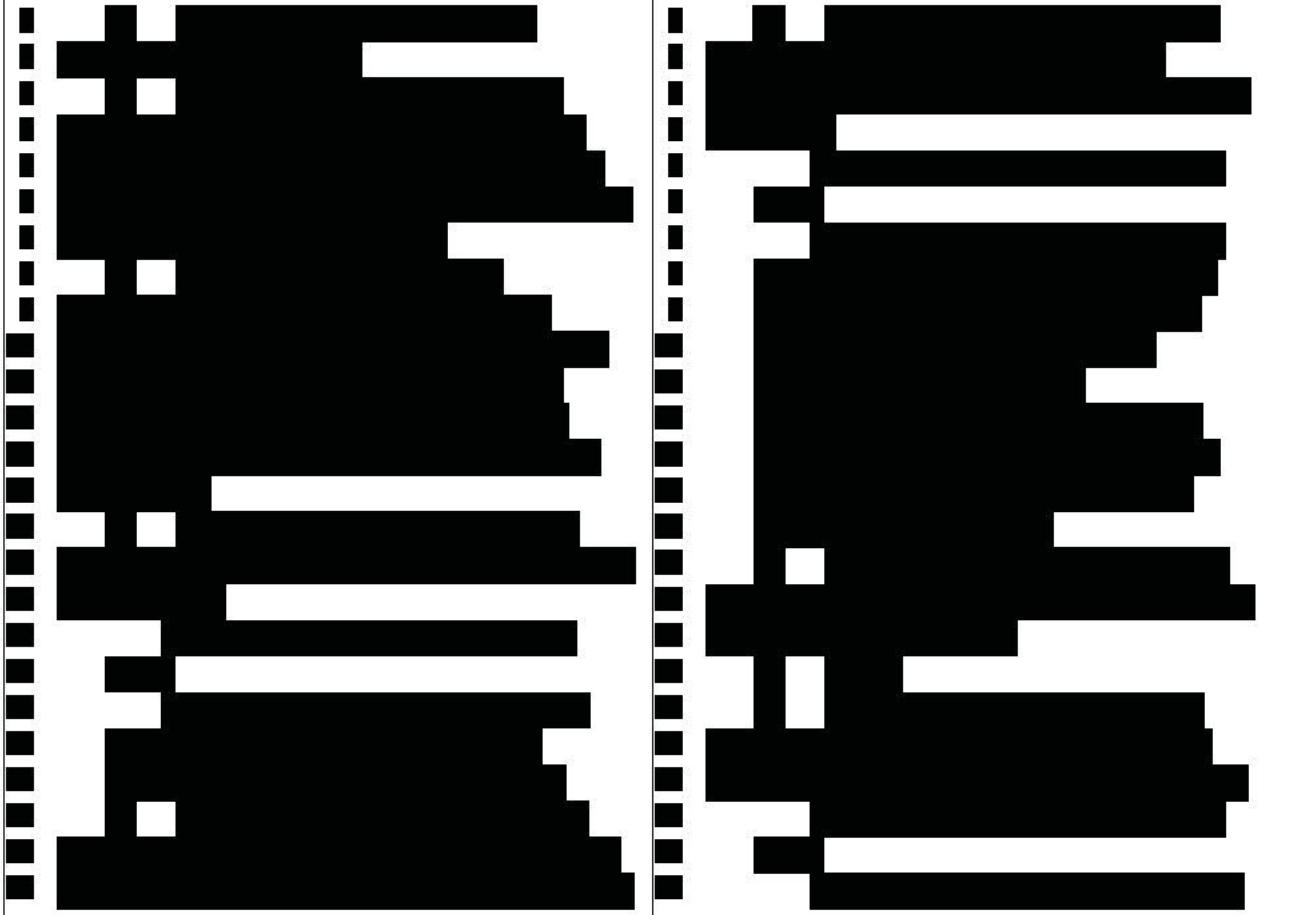
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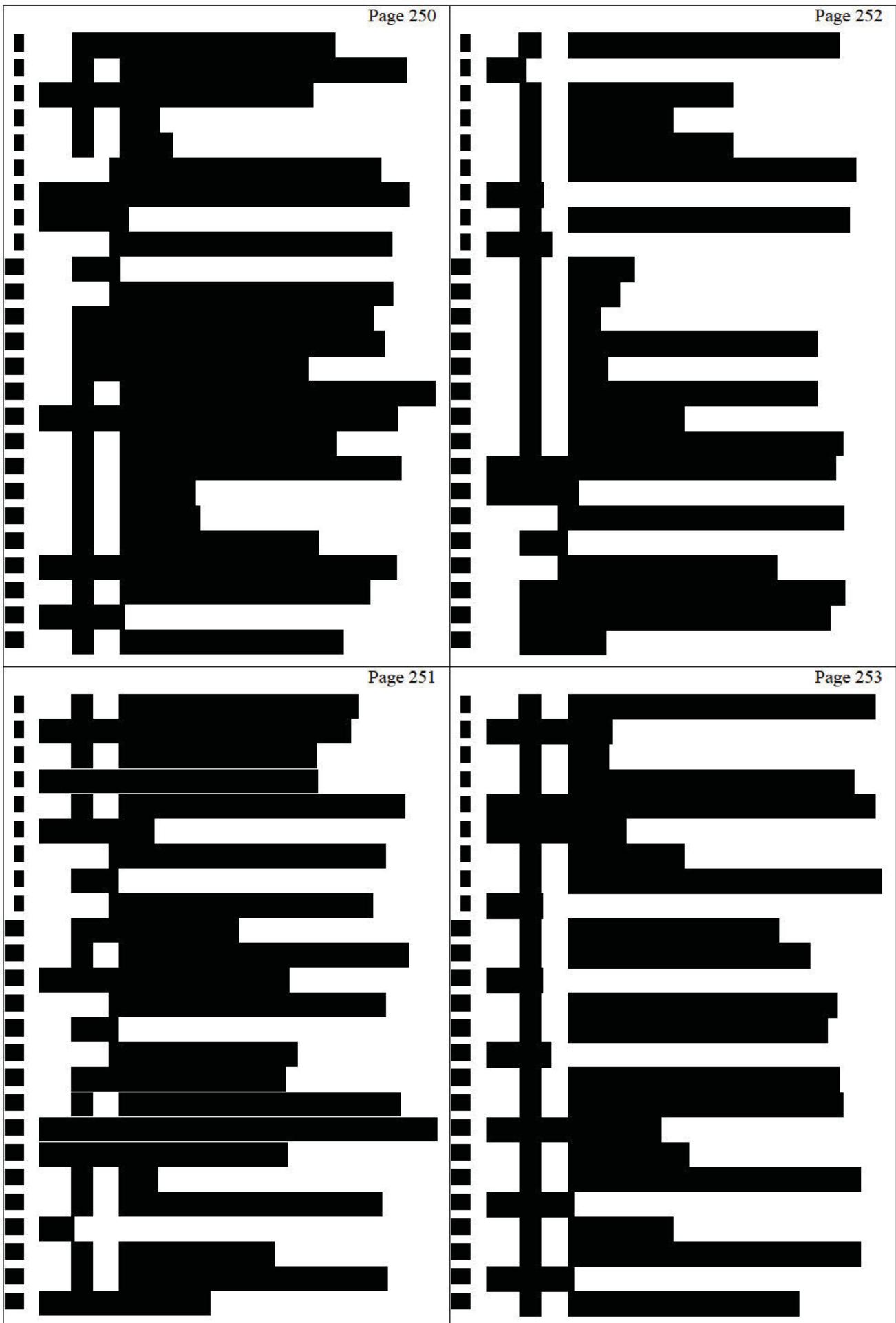


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Page 253



Page 254

Page 256

[REDACTED]

Page 255

Page 257

1 Do you have knowledge of the  
2 opioid crisis?  
3 A. Yes, I do.

[REDACTED]

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Page 260

[REDACTED]

Page 259

Page 261

[REDACTED]

Page 262	Page 264
[REDACTED]	[REDACTED]

Page 266	Page 268
[Redacted content from Page 266]	[Redacted content from Page 268]

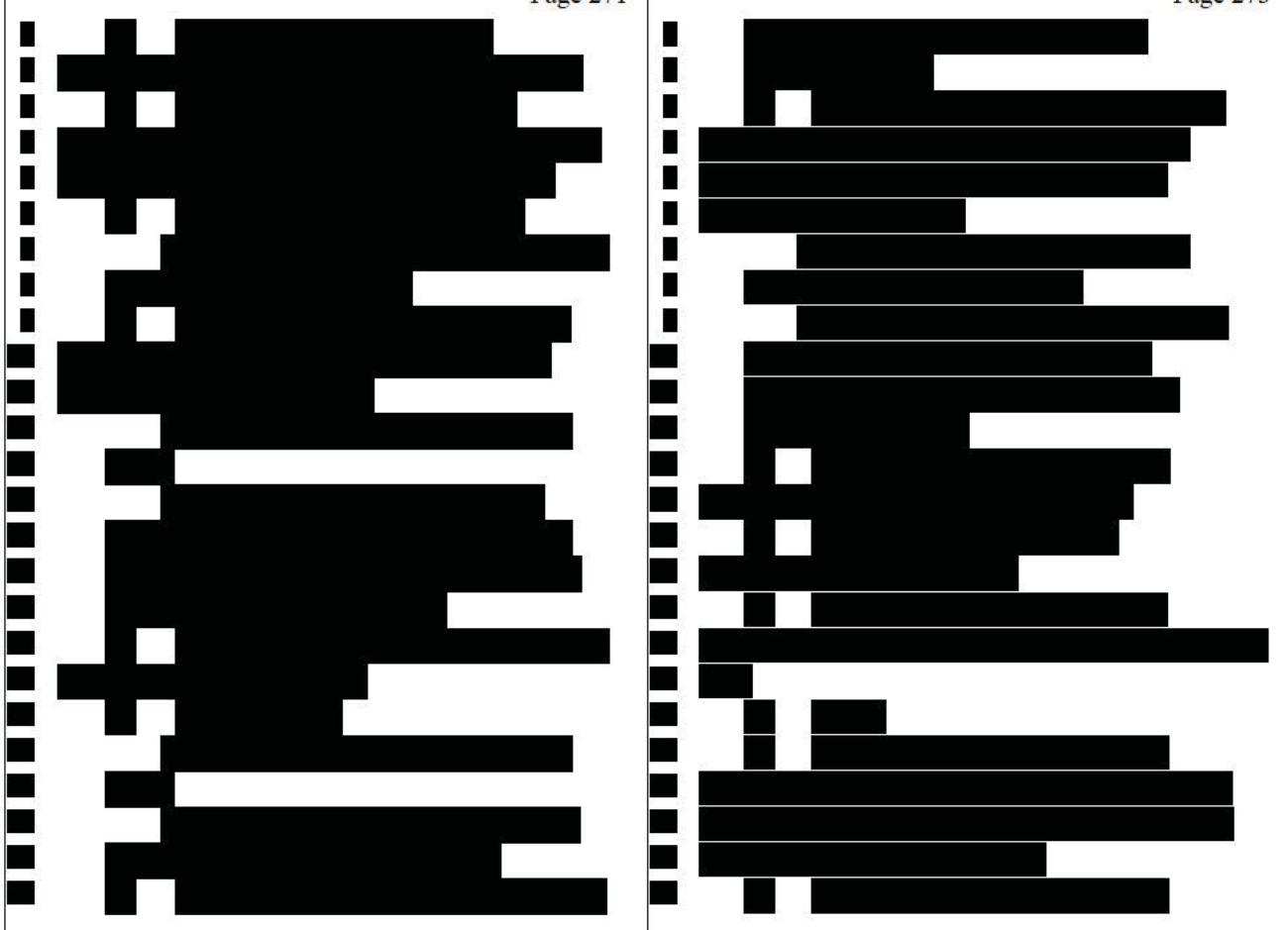
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Page 274

12 MR. INNES: Did you need --  
13 MS. TABACCHI: Well --  
14 THE WITNESS: I need some  
15 water.

16 MS. TABACCHI: If we can take a  
17 short break, when you're -- when you  
18 have the right place. I don't know  
19 how much longer you have. I don't  
20 want to throw off your plans.

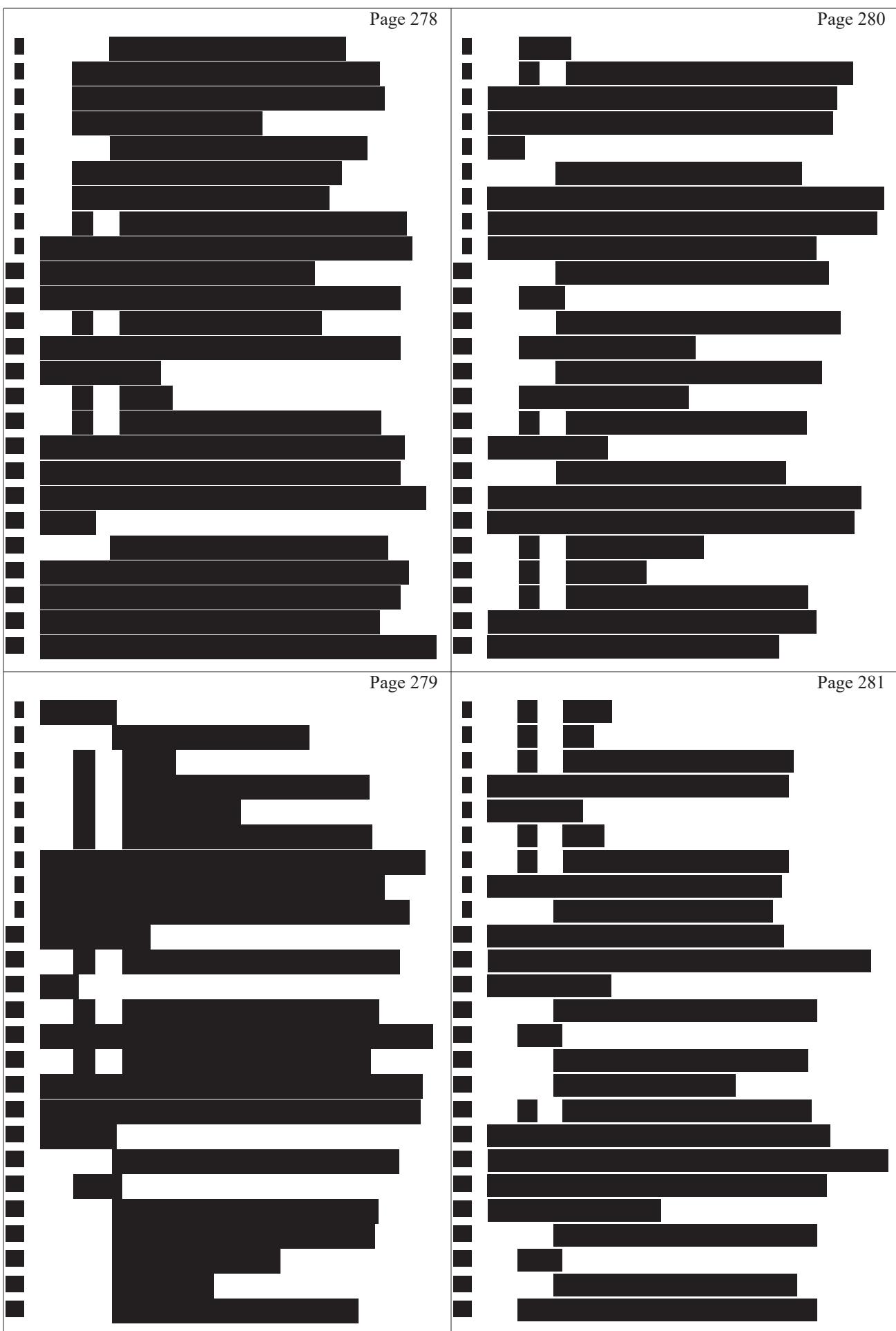
21 MR. INNES: Sure.

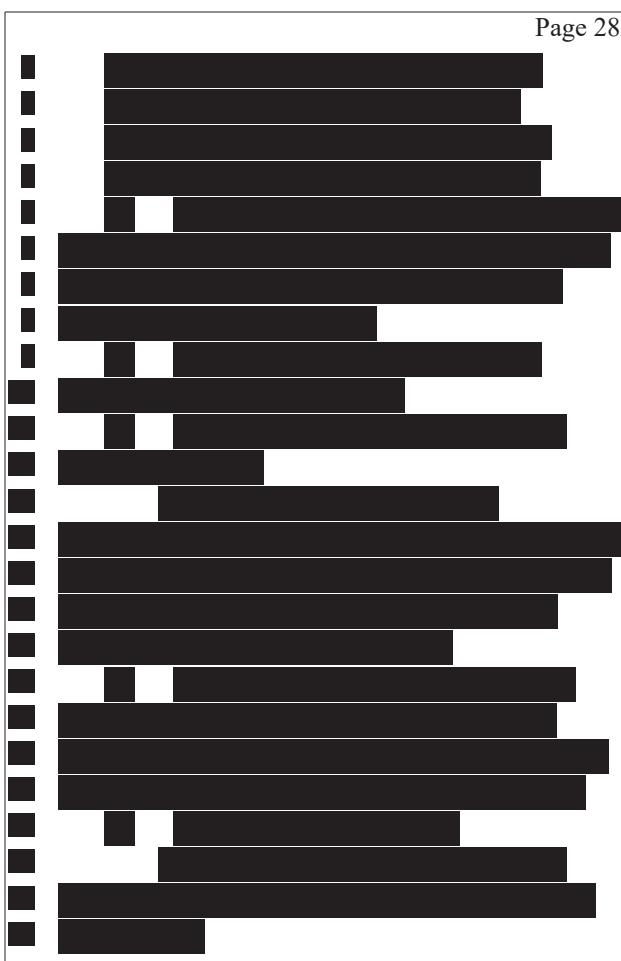
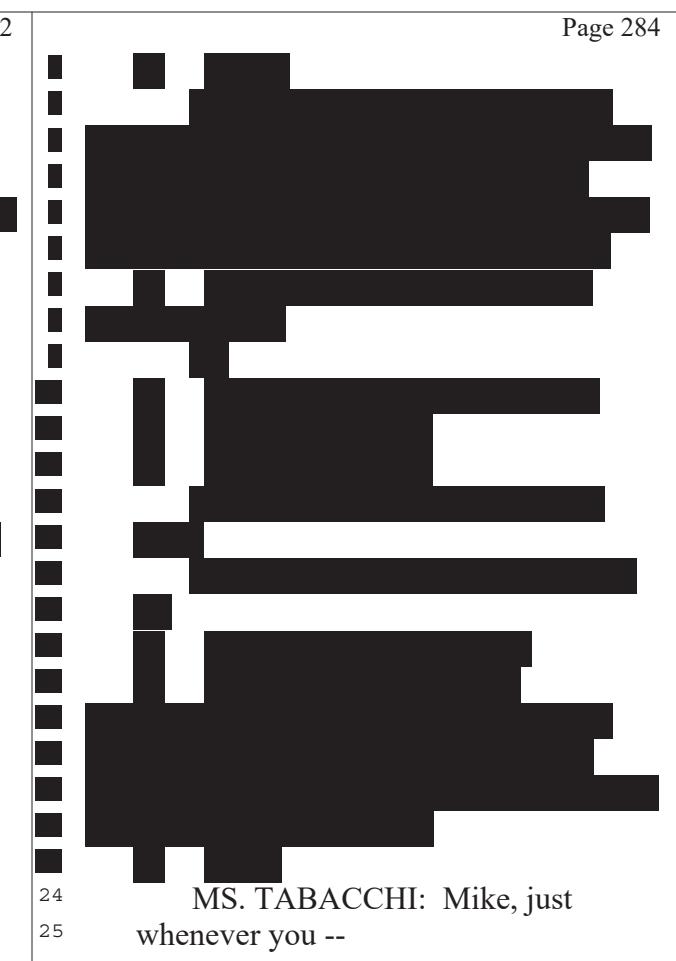
22 MS. TABACCHI: But ...

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<p>Page 282</p> 	<p>Page 284</p> 
<p>24 MS. TABACCHI: Mike, just 25 whenever you --</p> <p>Page 283</p> 	<p>Page 285</p> <p>1 MR. INNES: I'm sorry, I ran 2 over you. You asked for a break. We 3 can go --</p> <p>4 MS. TABACCHI: We'll be speedy.</p> <p>5 THE VIDEOGRAPHER: 2:37. We 6 are off the video record.</p> <p>7 (Recess taken, 2:38 p.m. to 8 2:50 p.m.)</p> <p>9 THE VIDEOGRAPHER: 2:50. We 10 are on the video record.</p> <p>11 Q. (BY MR. INNES) Okay, 12 Ms. Hodges. We are back. I think we'll make 13 one final push here. Before I begin with 14 some documents I want to ask if -- first of 15 all, are you aware that the trials in this 16 case are scheduled to go forward in Ohio in 17 the first bellwether trials?</p> <p>18 A. I'm aware of that.</p> <p>19 Q. And would you be willing to 20 come and testify in that trial to tell your 21 story to the jury?</p> <p>22 MS. TABACCHI: You can consult 23 with us about the testimony of our 24 Walmart witnesses when there's a 25 pretrial order. I'm not sure you need</p>

<p style="text-align: right;">Page 286</p> <p>1 to ask the witness that question 2 today.</p> <p>3 MR. INNES: I'm not asking 4 whether she will or will not come, I'm 5 asking if she's willing to come.</p> <p>6 THE WITNESS: It will be 7 determined by counsel whether I should 8 be there or not, I think.</p> <p>9 Q. (BY MR. INNES) Thank you for 10 that.</p> <p>11 Okay. So let me hand you 12 what's been marked as Exhibit 1.</p> <p>13 (Walmart-Hodges Deposition 14 Exhibit 1 was marked for 15 identification.)</p> <p>16 MR. INNES: I have copies here 17 for your counsel.</p> <p>18 Tina, you'll notice that there 19 are hole punches in the side. Those 20 are not part of the original. Those 21 are part of the copy job. You'll see 22 that on all three exhibits. I 23 apologize for that. I don't believe 24 that will impact any part of the 25 questions that I need to ask the</p>	Page 288
<p style="text-align: right;">Page 287</p> <p>1 witness or that the witness needs to 2 understand, but I'll let you be the 3 judge of that.</p> <p>4 Ms. Hodges, when you've had a 5 chance to review the document, please 6 let me know and we can start some -- 7 I'll ask my questions.</p> <p>8 [Document review.]</p> <p>9 MR. INNES: If it helps, I can 10 direct your attention to --</p> <p>11 THE WITNESS: I was just 12 reading all of it.</p> <p>13 MR. INNES: You're more than 14 welcome to. I'm going to represent to 15 you that I'm only going to ask you 16 questions about the one topic on the 17 page ending in Bates number -- that's 18 the number at the bottom right-hand 19 corner -- 263 --</p> <p>20 THE WITNESS: The top what?</p> <p>21 Q. (BY MR. INNES) The bottom 22 right-hand corner. 2637.</p> <p>23 A. Okay.</p>	Page 289

Page 290	Page 292
[REDACTED]	[REDACTED]

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[REDACTED]

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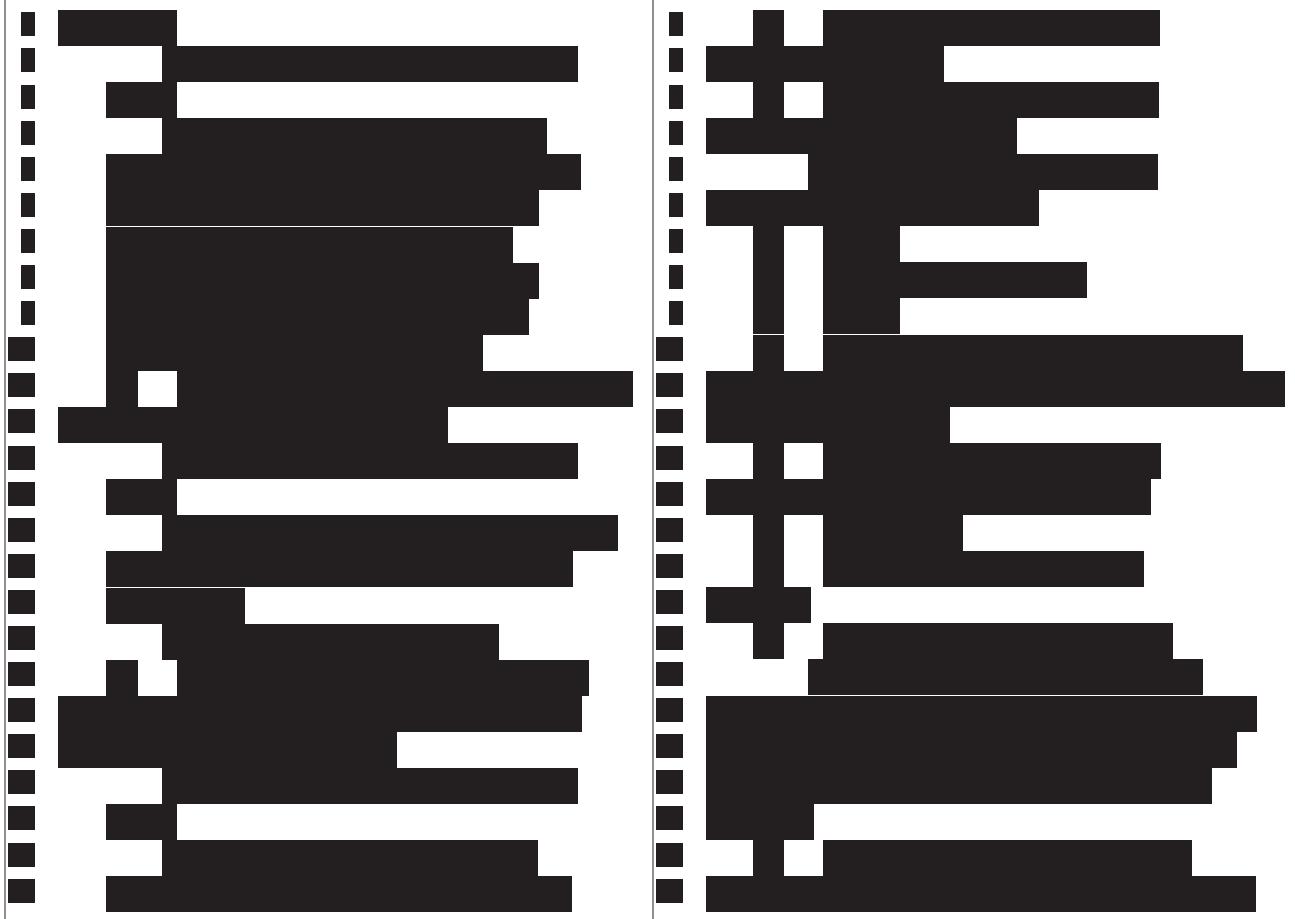
Page 300



The text block on pages 298, 300, and 301 consists of approximately 15 lines of text, each starting with a bold black square. The content is entirely obscured by black horizontal bars.

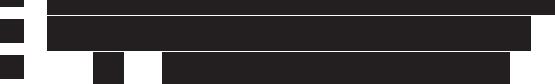
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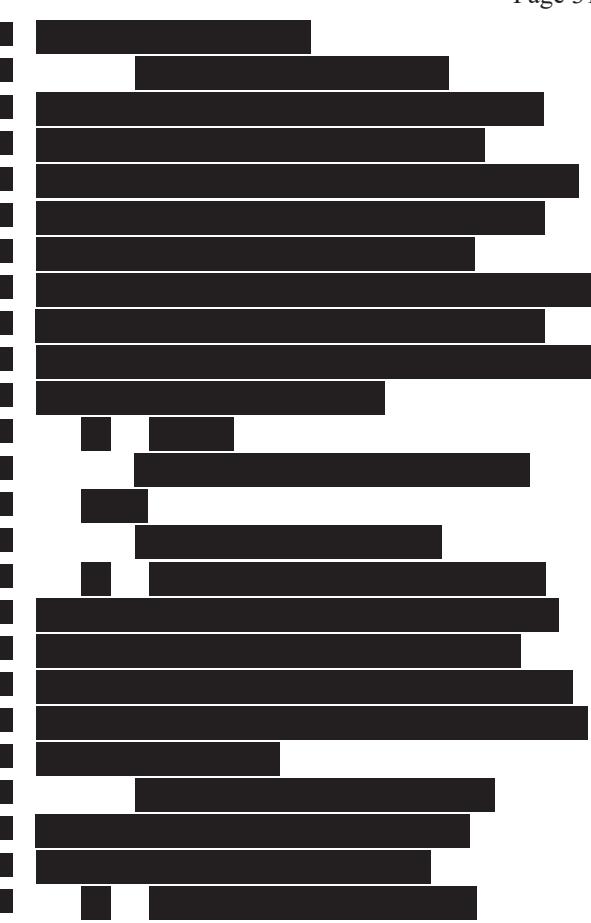
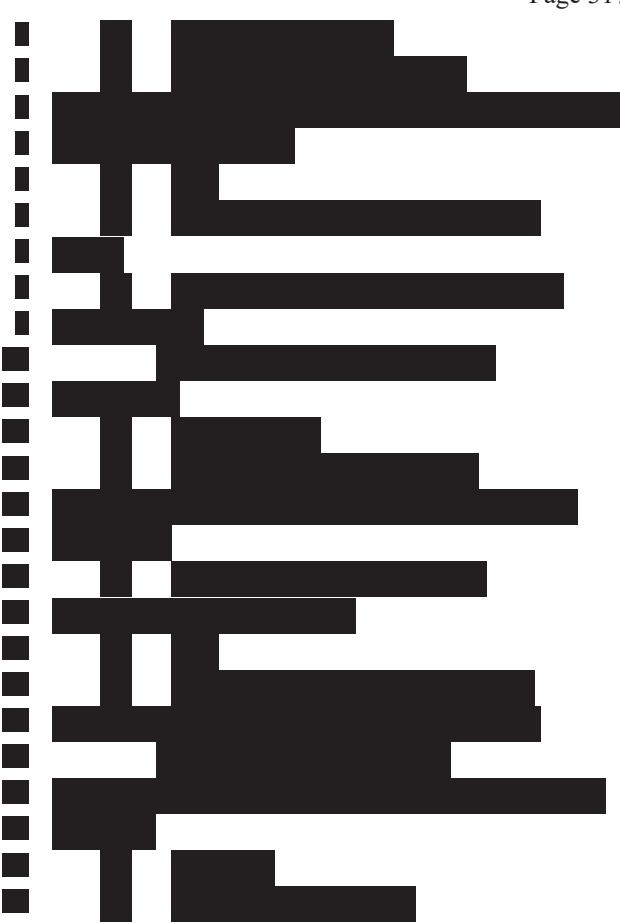


The text block on pages 299, 300, and 301 consists of approximately 15 lines of text, each starting with a bold black square. The content is entirely obscured by black horizontal bars.

Page 302	Page 304
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Page 306	Page 308
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
Page 307	
	
	
	
	
	
	
	
	
	
Page 309	

Page 310	Page 312
[Redacted content]	[Redacted content]

<p>Page 314</p> 	<p>Page 316</p> 
<p>Page 315</p> 	<p>Page 317</p> 

Page 318	Page 320
[REDACTED]	[REDACTED]

Page 322	Page 324
[REDACTED]	[REDACTED]

Page 326	Page 328
[Redacted content from Page 326]	[Redacted content from Page 328]

Page 330	Page 332
[REDACTED]	[REDACTED]

Page 334

[REDACTED]

Page 336

[REDACTED]

Page 335

[REDACTED]

Page 337

[REDACTED]

Page 338	Page 340
[REDACTED]	[REDACTED]
Page 339	Page 341

Page 342

[REDACTED]

Page 344

5 MS. TABACCHI: Do you mind if I  
6 just -- I don't -- there were lawyers  
7 present at this meeting, and I would  
8 appreciate just an opportunity to talk  
9 to the client before we talk about the  
10 substance of what was discussed in  
11 this meeting to make sure that there  
12 is no privilege issue.

13 MR. INNES: We can do that.

14 I'm a little surprised that you  
15 haven't talked to her about this  
16 meeting yet, but if you'd like to take  
17 a few minutes to do so, I'm happy to  
18 do it.

19 THE WITNESS: She hasn't.

20 MS. TABACCHI: Thank you.  
21 We'll be back.

22 THE VIDEOGRAPHER: 3:55. We  
23 are off the video record.

24 (Recess taken, 3:55 p.m. to  
25 3:59 p.m.)

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[REDACTED]

Page 345

1 THE VIDEOGRAPHER: 3:59. We  
2 are on the video record.

3 MR. INNES: We're back on the  
4 record. We took a break to allow  
5 counsel for Walmart to confer with  
6 Ms. Hodges regarding the pending  
7 question. I'll just read back the  
8 pending question so you have it.

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1 bank; is that correct?  
2 A. Correct.  
3 Q. And it's owned by a member of  
4 the Walton family? Is that --  
5 A. You've got me.  
6 I should have said "I don't  
7 know" rather than "You've got me." I don't  
8 know.  
9 Q. It's getting late in the day.

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Page 349

17 Q. Do you know where  
18 Lisa Holland -- strike that.  
19 Do you know if Lisa Holland  
20 obtained employment elsewhere after Walmart?  
21 A. Yes.  
22 Q. Do you know where she's  
23 employed?  
24 A. Arvest.  
25 Q. Arvest? Arvest is a regional

Page 350	Page 352
[REDACTED]	[REDACTED]
Page 351	Page 353

19 MR. INNES: Why don't you just  
20 give me a couple minutes.  
21 We can go off the record.  
22 THE VIDEOGRAPHER: 4:07. We  
23 are off the video record.  
24 (Recess taken, 4:07 p.m.  
25 4:11 p.m.)

<p>1 THE VIDEOGRAPHER: 4:11. We 2 are on the video record. 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>Page 354</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>1 CERTIFICATE 2 I, DEBRA A. DIBBLE, Registered 3 Diplomate Reporter, Certified Realtime 4 Reporter, Certified Realtime Captioner, 5 Certified Court Reporter and Notary Public, 6 do hereby certify that prior to the 7 commencement of the examination, DEBBIE 8 HODGES was duly sworn by me to testify to the 9 truth, the whole truth and nothing but the 10 truth. 11 I DO FURTHER CERTIFY that the 12 foregoing is a verbatim transcript of the 13 testimony as taken stenographically by and 14 before me at the time, place and on the date 15 hereinbefore set forth, to the best of my 16 ability. 17 I DO FURTHER CERTIFY that pursuant 18 to FRCP Rule 30, signature of the witness was 19 not requested by the witness or other party 20 before the conclusion of the deposition. 21 I DO FURTHER CERTIFY that I am 22 neither a relative nor employee nor attorney 23 nor counsel of any of the parties to this 24 action, and that I am neither a relative nor 25 employee of such attorney or counsel, and 26 that I am not financially interested in the 27 action. 28 DEBRA A. DIBBLE, RDR, CRR, CRC 29 NCRA Registered Diplomate Reporter 30 NCRA Certified Realtime Reporter 31 Certified Court Reporter 32 33 Dated: 15 January 2018 34 35</p> <p>Page 355</p> <p>1 Q. (BY MR. INNES) Okay. 2 MR. INNES: No further 3 questions. Unless you've got 4 questions, I'm fine to end the 5 deposition. 6 MS. TABACCHI: We have no 7 questions, no. 8 Thank you. 9 MR. INNES: All right. Thank 10 you. 11 MS. TABACCHI: We'll reserve 12 signature. 13 THE VIDEOGRAPHER: 4:12 p.m. 14 We are off the record. This concludes 15 the video deposition. 16 (Proceedings recessed at 17 4:12 p.m.) 18 --00o-- 19 20 21 22 23 24 25</p>
	<p>Page 357</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>1 INSTRUCTIONS TO WITNESS 2 3 Please read your deposition over 4 carefully and make any necessary corrections. 5 You should state the reason in the 6 appropriate space on the errata sheet for any 7 corrections that are made. 8 After doing so, please sign the 9 errata sheet and date it. 10 You are signing same subject to 11 the changes you have noted on the errata 12 sheet, which will be attached to your 13 deposition. 14 It is imperative that you return 15 the original errata sheet to the deposing 16 attorney within thirty (30) days of receipt 17 of the deposition transcript by you. If you 18 fail to do so, the deposition transcript may 19 be deemed to be accurate and may be used in 20 court. 21 22 23 24 25</p>

	Page 358	Page 360
1	ERRATA	LAWYER'S NOTES
2	PAGE LINE CHANGE	PAGE LINE
3	_____	_____
4	REASON: _____	_____
5	_____	_____
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25		_____
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1	ACKNOWLEDGMENT OF DEPONENT	
2		
3		
4	I, DEBBIE HODGES, do hereby certify	
5	that I have read the foregoing pages and that	
6	the same is a correct transcription of the	
7	answers given by me to the questions therein	
8	propounded, except for the corrections or	
9	changes in form or substance, if any, noted	
10	in the attached	
11	Errata Sheet.	
12		
13	DEBBIE HODGES	DATE
14		
15	Subscribed and sworn to before me this	
16	day of _____, 20 _____. 17 My commission expires: _____	
18		
19		
20	Notary Public	
21		
22		
23		
24		
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